

Final Draft

INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN UPDATE

FOR

SITES AND TRAINING INSTALLATIONS OF THE
HAWAII ARMY NATIONAL GUARD

FISCAL YEARS 2016-2021

Prepared for



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HAWAII NATIONAL GUARD

ABBREVIATIONS AND ACRONYMS

AASF	Army Aviation Support Facility	MILCON	Military Construction
ACHP	Advisory Council on Historic Preservation	MOA	Memorandum of Agreement
ACSIM	Assistant Chief of Staff for Installation Management	NAC	Native American Consultation
AEDB-EQ	Army Environmental Database – Environmental Quality	NAGPRA	Native American Graves Protection and Repatriation Act of 1990
AR	Army Regulation	NBC	Nuclear, Biological, Chemical
ARE	Army-Environmental	NEPA	National Environmental Policy Act of 1969, as amended
ARNG	Army National Guard	NGB	National Guard Bureau
ARPA	Archaeological Resources Protection Act	NHPA	National Historic Preservation Act of 1966, as amended
APE	Area of Potential Effect	NHOs	Native Hawaiian Organization
CA	Comprehensive Agreement	NPS	National Park Service
CFMO	Construction and Facility Management Office	NRHP	National Register of Historic Places
CAP	Civil Air Patrol	ODEP	Office of Director of Environmental Programs
CRM	Cultural Resources Manager	PA	Programmatic Agreement
CSMS	Combined Support Maintenance Shop	PAO	Public Affairs Office
CX	Categorical Exclusion	PL	Public Law
DA	Department of the Army	POC	Point of Contact
DCA	Departmental Consulting Archaeologist	POTO	Planning Operations and Training Office
DoD	U.S. Department of Defense	PRIDE	Planning Resources for Infrastructure Development and Evaluation
DoDI	Department of Defense Instruction	RC	Readiness Center
DOI	Department of the Interior	REC	Record of Environmental Consideration
DSCOPS	Operations Manager in the Directorate of Operations	RMDA	Records Management and Declassification Agency
EA	Environmental Assessment	RPI	Real Property Inventory
EIS	Environmental Impact Statement	RTLA	Range Training Land Assessment
EO	Executive Order	SDS	Spatial Data Standards
EPAS	Environmental Performance Assessment System	SDSFIE	Spatial Data Standards for Facilities, Infrastructure, and Environment
EQCC	Environmental Quality Control Committee	SHPD	Hawaii State Historic Preservation Division
ESOH	Environmental Safety and Occupational Health	SHPO	State Historic Preservation Officer
FGDC	Federal Geographic Data Standards	SJA	Staff Judge Advocate
FMS	Field Maintenance Shop	SOP	Standard Operating Procedure
FNSI	Finding of No Significant Impact	SOW	Scope of Work
FY	Fiscal Year	SPIRS	State Performance Indicator Reporting System
GIS	Geographic Information System	STEP	Status Tool for the Environmental Program
HABS	Historic American Building Survey	TAG	The Adjutant General
HAER	Historic American Engineering Record	TDA	Table of Distribution and Allowance
HAR	Hawaii Administrative Rules	THPO	Tribal Historic Preservation Officer
HIDoD	State of Hawaii, Department of Defense	TOE	Table of Organization and Equipment
HIARNG	Hawaii Army National Guard	UFC	Unified Facilities Criteria
HRHP	Hawaii Register of Historic Places	UPH	Unaccompanied Personnel Housing
HRS	Hawaii Revised Statutes	USC	United States Code
HQDA	Headquarters, Department of the Army	USACE	U.S. Army Corps of Engineers
ICRMP	Integrated Cultural Resources Management Plan	USACERL	U.S. Army Construction Engineering Research Laboratory
IFS	Integrated Facilities System	USAEC	U.S. Army Environmental Center
ISR	Installation Status Report	UTES	Units Training Equipment Site
ITAM	Integrated Training Area Management	WETS	Weekend Training Site
JAG	Judge Advocate General		
MACOM	Major Army Command		
MATES	Maneuver Area Training Equipment Site		

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FISCAL YEARS 2016-2021



**STATE OF HAWAII, DEPARTMENT OF DEFENSE
HAWAII ARMY NATIONAL GUARD
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816**

SEPTEMBER 2015

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SIGNATURE PAGE

This Integrated Cultural Resources Management Plan (ICRMP) Update meets the requirements for ICRMPs set forth in Department of Defense Instruction 4715.3 Environmental Conservation Program, Army Regulation 200-1 *Environmental Protection and Enhancement*, and Army Pamphlet 200-1.

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Executive Summary

The Hawaii Army National Guard (HIARNG) has been managing cultural resources for several years under a previously developed Integrated Cultural Resources Management Plan (ICRMP). This updated ICRMP builds upon the 2008-2012 ICRMP in terms of including those elements identified as significant issues by internal and external stakeholders during the review process for the previous ICRMP, but differs from the previous ICRMP in several respects. First, this ICRMP Update includes the following:

- Executive Order (EO) 13423 – Strengthening Federal Environmental, Energy, and Transportation Management (24 January 2007). Expressing the goal of strengthening the environmental, energy, and transportation management of federal agencies, EO 13423 requires federal agencies to conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.
- DoDI 4710.03 – DoD Consultation with Native Hawaiian Organizations (25 October 2011). This instruction establishes policy and addresses the policies and interactions that govern consultation between NHOs and DoD, establishes a framework for consultation, and provides the DoD components in Hawaii with a framework to develop localized processes to facilitate consultation.
- DoDI 4715.16 – Cultural Resources Management (18 September 2008). This instructs management of cultural resources in a sustainable manner that considers the preservation of historic, archaeological, architectural, and cultural values.
- World War II Temporary Buildings Programmatic Agreement (PA) (1986). The 1986 PA on World War II-era temporary buildings addresses these standardized buildings as a class in evaluation and documentation. The PA prescribes when demolition may proceed without further action and when the State Historic Preservation Officer (SHPO) shall review the undertaking. Specifically, the PA allows demolition without further consultation for World War II-era temporary buildings; projects involving renovation, repair, rehabilitation, or movement of these buildings remain undertakings that require consultation with the SHPO. As part of the implementation of this PA, the Historic American Building Survey (HABS) documented representative examples of World War II-era temporary buildings across the United States. The majority of representative examples selected for documentation occurred at three facilities: Fort McCoy in Wisconsin, Fort Drum in New York, and Camp Edwards in Massachusetts.
- Program Comment for WWII and Cold War Era Facilities (1939-1974) Army Ammunition Production Facilities and Plants (2006). This Program Comment provides the Army with an alternative method of compliance with Section 106 and with regard to the effect of management actions on World War II (WWII) and Cold War Era Army Ammunition Production Facilities and Plants that may be eligible for listing in the National Register of Historic Places (NRHP) (Facilities and Plants): On-going operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.

- Nationwide PA for Army National Guard (ARNG) Readiness Centers Maintenance and Repair (2010). The PA for ARNG Readiness Centers applies to both federally- and state-owned Readiness Centers (previously designated as Armories) that are 50 years old or older, or that are considered eligible under NRHP criterion consideration G (Exceptional Significance). The terms of the Nationwide PA apply to ARNG undertakings concerning the maintenance and treatment, rehabilitation, renovation, and mothballing of Readiness Centers and associated structures and featured landscapes. The stipulations of the PA include a list of ARNG actions considered to be exempt from Section 106 review, a list of ARNG undertakings that could be completed with an expedited Section 106 review process, and procedures for undertakings not covered by the expedited review process. A national historic context document and a condition assessment of ARNG Readiness Centers were prepared as supporting documents for this PA.
- National Guard Bureau – ARNG Cultural Resources Handbook (2013). This handbook establishes cultural resource identification priorities and evaluation standards for all ARNG installations and provides a schedule to accomplish program objectives. Central to this purpose is the identification of cultural resources and determination of the resources’ eligibility for listing in the NRHP. Cultural resources under the stewardship of an installation might consist of archaeological sites, cultural landscapes, documents, buildings and structures, Native American sacred sites, and properties of traditional, religious, and cultural significance, including artifacts collected during previous projects. A successful cultural resource management program requires projects to identify resources, implement protection and compliance actions, and consult with internal and external stakeholders. This handbook provides guidance and supports the ARNG cultural resources management program in achieving regulatory compliance and ensuring that ARNG stewardship responsibilities are met.
- National Guard Bureau – Memorandum for Environmental Managers (15 May 2012). This memorandum updates the ARNG Environmental Division (ARNG-ILE) guidance to the state ARNG Environmental Offices on their cultural resources compliance requirements for the National Historic Preservation Act (NHPA) associated with the completion of National Environmental Policy Act (NEPA) Records of Consideration (RECs) and guidance using Categorical Exclusions to comply with NEPA.
- National Guard Bureau – NGB-ARE (National Guard Bureau) (Army-Environmental). Memorandum for Environmental Program Manager (EPM) of all States, Puerto Rico, the US Virgin Islands, Guam, and the District of Columbia (2010). Establishes guidance for the update, revision, and implementation of ICRMP.
- National Guard Bureau – ARE-C All States Letter (P02-0058) – Cultural Resources Management Policy Guidance. This letter provides guidance for ICRMPs and the annual update process for future ICRMPs. It also identifies nationwide goals for cultural resources programs.
- National Guard Bureau – ARE-C ICRMP Guidance (see Appendix K).
- The Standard Operating Procedures (SOPs) have been streamlined from the previous 2008-2012 ICRMP, so the responsibilities of and guidance to HIARNG Cultural Resources Manager (CRM) is minimized to the CRM’s Toolbox in Appendix J, and instructions for non-environmental personnel are emphasized and simplified with flow charts, graphics, and user guides in the 2016-2021 ICRMP.

Secondly, this ICRMP Update uses a standard format to enable consistency throughout the country and territories. Elements included within this ICRMP Update include the input provided by internal and external stakeholders during development of the previous ICRMP, additional input from stakeholders obtained through the review process for the ICRMP Update, and information provided by the HIARNG CRM. Internal and external stakeholders who participated in the development of both the 2008-2012 ICRMP and this ICRMP Update include HIARNG and National Guard Bureau (NGB) personnel, the State of Hawaii Department of Land and Natural Resources (DLNR) State Historic Preservation Division (SHPD), and representatives of Native Hawaiian Organizations (NHOs). The SHPD Administrator functions as the State Historic Preservation Officer (SHPO) as defined under Section 101 of the NHPA.

DoDI 4715.16 and Army Regulation (AR) 200-1 require installations to develop an ICRMP as an internal compliance and management tool that integrates the entirety of the cultural resources program with ongoing mission activities. As a component of the installation master plan, the ICRMP is the HIARNG Commander's decision document for conduct of cultural resources management actions and specific compliance procedures. This ICRMP is an internal ARNG compliance and management plan that integrates the entirety of the state's cultural resources program requirements with ongoing mission activities. It also allows for ready identification of potential conflicts between the HIARNG mission and cultural resources and identifies compliance actions necessary to maintain the availability of mission-essential properties and acreage.

This ICRMP Update for the HIARNG is designed to support the military mission and assist individual installations in meeting the legal compliance requirements of federal historic preservation laws and regulations in a manner consistent with the sound principles of cultural resources stewardship. This ICRMP Update establishes priorities for the identification and standards for the evaluation of cultural resources within the HIARNG virtual installation and provides a schedule to accomplish program objectives during a 5-year program. The ICRMP also provides a brief description of the HIARNG virtual installation, an overview of all known cultural resources across all HIARNG sites, the status of inventory and evaluation of resources at each site and training installation, and appropriate compliance and management activities for the next five years. The sites and training installations that comprise the HIARNG virtual installation are listed in Chapter 2 and Appendix D.

Cultural resources under the stewardship of HIARNG can consist of archaeological sites, cultural landscapes, documents, buildings, and structures; Native Hawaiian sacred sites and properties of traditional, religious, and cultural significance; and previously collected artifacts. An inventory of cultural resources at the HIARNG sites listed above has been compiled based on the results of archaeological surveys, historic architectural evaluations, and archival and site record searches that have been completed. To date, 28 historic buildings and structures, 15 archaeological (pre-contact and historical) sites, one historic landscape, and no landscapes of traditional, cultural, or religious significance to Native Hawaiians have been recorded on HIARNG sites and training installations. Refer to table 2-1 for more detailed information by HIARNG installation. HIARNG operational and training activities have the potential to impact cultural resources. Typical examples of management actions that help prevent future impacts include the identification and avoidance of archaeologically and culturally sensitive areas, consideration of cultural resources as early as possible in the project planning process, and ensuring that personnel that are responsible for the management of cultural resources at each installation receive adequate training.

HIARNG operational and training activities have the potential to impact cultural resources. Management actions proposed by the HIARNG under the 2008-2012 ICRMP to avoid or minimize

impacts to cultural resources are listed in Chapter 2, Table 2-2. The majority of goals and management actions recommended in the previous 2008-2012 ICRMP were successfully completed and/or implemented.

A full discussion of the successes and challenges of the HIARNG Cultural Resources Program over the past five years is provided in Chapter 2 of this ICRMP Update. Review of these successes and challenges with internal and external stakeholders has led to the development of goals and proposed management actions for the HIARNG Cultural Resources Program over the next five years, as listed in Chapter 2.

Implementation of these actions over the next five years will allow HIARNG to efficiently meet its obligations of compliance with cultural resources legislation while supporting the vital military mission at each of its sites and training installations. By implementing the management actions in this plan, the HIARNG goes beyond minimal compliance to accept the leadership role that the NHPA envisions for federal agencies to manage cultural resources in a spirit of stewardship for the inspiration and benefit of present and future generations.

The HIARNG, per Army policy in 200-1, prepared an Environmental Assessment (EA) for the 2008-2012 ICRMP to ensure public notification of, and participation in, the ICRMP development process (HIARNG 2008). This ICRMP update does not require an EA. SHPD, NHOs, and stakeholders will be given the opportunity to review and comment on the 2016-2021 ICRMP.

This report specifically omits the *‘okina* and *kahakō* diacritical marks to be consistent with State of Hawaii usage. The *‘okina* and *kahakō* diacritical marks are used in this report for names of people and organizations, and other Hawaiian words as needed. Hawaiian words are italicized and defined in the text as required.

**FINAL INTERNAL DRAFT
INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN REVISION
HAWAII ARMY NATIONAL GUARD
FISCAL YEARS 2016-2021**

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1. Introduction

The HIARNG has been managing its cultural resources program under a previously developed Integrated Cultural Resources Management Plan (ICRMP). This ICRMP is an update of the plan prepared for the HIARNG for Fiscal Years (FY) 2008-2012, and represents an instruction manual for the cultural resources management program for FY 2016-2021. It differs from the previous ICRMP primarily in two areas. First, this ICRMP Update includes:

- Executive Order (EO) 13423 (24 January 2007) – Strengthening Federal Environmental, Energy, and Transportation Management. Expressing the goal of strengthening the environmental, energy, and transportation management of federal agencies, EO 13423 requires federal agencies to conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically, and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.
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- Nationwide PA for Army National Guard (ARNG) Readiness Centers Maintenance and Repair (2010). The PA for ARNG Readiness Centers, applies to both federally and state-owned Readiness Centers (previously designated as Armories) that are 50 years old or older, or that are considered eligible under NRHP criterion consideration G (Exceptional Significance). The terms of the Nationwide PA apply to ARNG undertakings concerning the maintenance and treatment, rehabilitation, renovation, and mothballing of Readiness Centers and associated structures and featured landscapes. The stipulations of the PA include a list of ARNG actions considered to be exempt from Section 106 review, a list of ARNG undertakings that could be completed with an expedited Section 106 review process, and procedures for undertakings not covered by the expedited review process. A national historic context document and a condition assessment of ARNG Readiness Centers were prepared as supporting documents for this PA.
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- National Guard Bureau – ARE-C ICRMP Guidance (see Appendix K)
- National Guard Bureau – Integrated Cultural Resources Management Plan. Per AR 200-16-4a(1), all federally owned Army, ARNG, and Army Reserves installations have statutory and regulatory cultural resources management responsibilities that necessitate the preparation and implementation of an ICRMP. States should use the most recent ICRMP, available on Guard

Knowledge Online (GKO). Additional guidance on ICRMPs is available in the 25 January 2010 Memorandum for Environmental Managers.

- The Standard Operating Procedures (SOPs) have been streamlined from the 2008-2012 ICRMP, so the responsibilities of and guidance to HIARNG Cultural Resources Manager (CRM) is minimized to the CRM's Toolbox in Appendix J. Instructions for non-environmental personnel are emphasized and simplified with flow charts, graphics, and user guides in the 2016-2021 ICRMP.

Secondly, this ICRMP Update was developed from a standard format to ensure consistency throughout the country and territories. Elements included within this ICRMP Update include the input provided by internal and external stakeholders during development of the previous ICRMP, additional input from stakeholders obtained through the review process for the ICRMP Update, and information provided by the HIARNG Cultural Resources Manager (CRM). Internal and external stakeholders who participated in the development of both the 2008-2012 ICRMP and this ICRMP Update include HIARNG and NGB personnel, the State Historic Preservation Division (SHPD), and Native Hawaiian Organizations (NHOs). The HIARNG CRM provided state-specific information for the development of the ICRMP Update including text describing cultural resources projects completed over the past five years; a review of program goals from the previous ICRMP and a summary of how those goals were or were not met; goals and projects developed for the next five years; and information on any new state regulations and requirements.

ICRMPs are required by internal military statutes and regulations, which include AR 200-1: *Cultural Resources Management*, DoDI4715.3: *Environmental Conservation Program*, and DoD Measures of Merit. The ICRMP is a five-year plan that supports the military training mission through identification of compliance actions required by applicable federal laws and regulations concerning cultural resources management.

The HIARNG has both federal and state missions. The HIARNG federal mission, outlined in Statutes and Regulations, is to maintain properly trained and equipped units available for prompt mobilization for war, national emergency, or as otherwise needed. The state mission is to provide trained and disciplined forces for domestic emergencies or as otherwise required by state laws. The Army also has an environmental mission to sustain the environment to enable the Army mission and secure the future.

This introductory chapter describes the purpose of the ICRMP, the goals of the HIARNG cultural resource program, and the organization of the ICRMP. It also outlines roles and responsibilities of both military and nonmilitary stakeholders.

1.1 Mission and Goals for the HIARNG Cultural Resource Program

The mission of the HIARNG cultural resource program is to support the HIARNG mission, achieve regulatory compliance, and ensure that HIARNG stewardship responsibilities are met. Fundamental to this mission is the identification of cultural resources and evaluation of their eligibility for listing in the NRHP. A successful cultural resources management program requires projects to identify and evaluate resources, implement protection and compliance actions (such as review of proposed undertakings under Section 106 of the NHPA), and collaborate with internal and external stakeholders to advance awareness and preservation.

1.1.1 Mission

The mission of the HIARNG Environmental Office is to provide policy, technical assistance, and guidance on issues governing the Army's pillars of Environmental stewardship. The staff supports the Hawaii Army National Guard's challenge of providing realistic military training to Guard members on five Hawaiian Islands by implementing training, compliance, conservation, pollution prevention, and awareness programs to minimize the impacts of training on the environment and by complying with regulations to ensure that environmental protection is an integral part of the Guard's decision-making process.

1.1.2 Goals

The HIARNG has established overarching goals to guide their 5-year management and compliance actions as listed in Chapter 2 of this ICRMP Update. Accordingly, the goals for the HIARNG cultural resource program area as follows:

- **Support Sustainable Training**
 - Provide accurate landscape data for soldiers and user groups
 - Reduce landscape access restrictions
 - Specify resource avoidance areas
- **Protect Resources from Damage**
 - Monitor resource impacts from training activities, natural processes, animal damage, looting and demolition
 - Implement protective measures, such as fencing, overfill/capping, mitigation and rehabilitation
 - Develop cultural awareness materials
- **Conserve Resources and Their Information for Future Generations**
 - Maintain artifacts, documentation, photos, maps, etc. in accordance with 36 CFR Part 79
 - Stabilize resources from further degradation
- **Integrate Cultural Resource Management with Installation Operations**
 - Attend regular facilities meetings with the Facilities Management Office (FMO) and G3 office. Attend Chief of Staff (CoS) Briefs and brief commanders at EQCC meetings
 - Disseminate the ICRMP to all HIARNG offices and make available on ENV website
 - Implement Standard Operating Procedures for addressing cultural resources issues on the installation
- **Implement Regular Consultation with Stakeholders**
 - Develop a database of NHOs and stakeholders to contact for specific undertakings
 - Consult with the Hawaii SHPD early and often on all undertakings
 - Reach out to local historical societies and other interested parties
- **Increase Cultural Resources Appreciation**
 - Incorporate cultural resources awareness in Soldier Training Programs
 - Increase civilian and community awareness participatory activities

1.2 Revised Real Property Definitions

All federally owned or controlled Army, ARNG, and Army Reserves installations having statutory and regulatory cultural resources management responsibilities must prepare and implement an ICRMP per AR 200-1. Further, NGB guidance requires that all HIARNG holdings be included in the plan, regardless of whether they are state or federally owned because federal actions or funding might be implemented, which, in turn, triggers compliance with federal regulations.

Per the NGB-ARI Memorandum dated 20 January 2006 regarding New Real Property Inventory Definitions of Installations and Sites, this ICRMP Update uses the following new terminology for HIARNG infrastructure, as follows:

- **Parcel:** a parcel is a contiguous piece or pieces of land described in a single real estate instrument. A parcel can also be described as a specific area of land whose perimeter is delineated by metes and bounds or other survey methods. A parcel represents each individual land acquisition by deed or grant (i.e., each separate real estate transaction). A single real estate transaction may acquire multiple parcels. Each parcel is shown by a single lot record in the Real Property Inventory (RPI). Parcels are, therefore, the building blocks of land for a site. A parcel is created by a real estate transaction whereby a Military Department or the State acquires an interest in land, and a legal instrument evidences the interest so acquired.
- **Site:** in the broadest terms a site is a geographic location. In more focused terms, a site is a specific area of land consisting of a single parcel or several contiguous parcels. Each site must be able to produce a closed cadastral survey. A site can be any physical location that is or was owned by, leased to, or otherwise possessed by one Military Service or State (for National Guard purposes), to include locations under the jurisdiction of the ARNG where a hazardous substance has been deposited, stored, disposed of, placed, or otherwise came to be located. Do not combine federal parcels with state parcels in a single site, even if contiguous. There will be no sites that contain both federal- and state-owned property; create separate sites. A site may exist in one of three forms:
 - Land only where there are no facilities present and where the land consists of either a single parcel or two or more contiguous parcels.
 - Facility or facilities only where the underlying land is neither owned nor controlled by the federal or state government. A stand-alone facility can be a site. If a facility is not a stand-alone facility, it must be assigned to a site.
 - Land and all facilities thereon where the land consists of either a single parcel or two or more contiguous parcels.

Example of rule applied – a road owned by the state or municipality that traverses an area (i.e., the road only is granted by the easement, not the property underneath). The rule defines such an area as a single site if the military retains control of ownership of the land under the road. However, if the road and the right-of-way along the road are owned by a party other than the Military Department (i.e., the road and the right-of-way [including property under the road] is granted in the easement), then this would be two sites since contiguous ownership does not exist.

- **Installation:** For real property purposes, an installation is a single site or a grouping of two or more sites for inventory reporting. Each state represents a single virtual installation consisting of all sites the state controls except sites designated as training installations. Training installations can be their own installations if they have their own command structure and if National Guard Bureau, Army Installations Division (NGB-ARI) and NGB, Training Division (-ART) have jointly agreed that they may be listed as their own ARNG training installation. One or more sites may be assigned to any one installation, but each can only be assigned to a single installation. An installation can exist in three possible forms:
 - A single site designated as an installation (e.g., Camp Roberts, California).
 - Several non-contiguous or contiguous sites grouped together as a single ARNG training installation (e.g., Camp Shelby, Mississippi).
 - Several contiguous or non-contiguous sites grouped together as a single virtual installation, (e.g., ARNG manages all the sites in a single state as a virtual installation).

1.3 Organization of the ICRMP Update

The ICRMP Update has been organized to facilitate cultural resources management and compliance with AR 200-1 and federal and state cultural resources management regulations and requirements. The ICRMP Update is organized into the following sections:

Chapter 1: Introduction to the ICRMP Update. This chapter introduces the ICRMP Update, purpose, and goals for the cultural resources management program; document organization; and stakeholder reviews during development of the ICRMP Update. This chapter also identifies the roles and responsibilities of HIARNG personnel, jurisdictional agencies, and stakeholders that are involved in the cultural resources compliance process.

Chapter 2: Cultural Resources Management Strategy. This chapter provides a summary of the goals and management actions proposed in the 2008-2012 ICRMP and a discussion of how those goals were met and which management actions were completed. Challenges faced during implementation of the 2008-2012 ICRMP are also discussed. The data provided in this review are then used to inform the development of goals and management actions for the HIARNG Cultural Resources Program over the next five years. This chapter also identifies stakeholder planned projects that could have an effect on cultural resources and recommendations for completing these projects in compliance with cultural resources management laws and regulations. Finally, this chapter provides discussions of the HIARNG's tribal consultation program and curation status of any collections under HIARNG control.

Chapter 3: Standard Operating Procedures (SOPs). HIARNG personnel, whose mission and responsibility are not the management of cultural resources, may come into contact and could affect cultural resources through their work. This chapter provides SOPs to aid such personnel in identifying those situations and guiding their actions to ensure compliance and to protect cultural resources.

Chapter 4: References and Resources. This chapter includes references and resources supporting the development of the ICRMP and the implementation of the cultural resources program.

Appendices: In contrast to the previous ICRMP, most of the guidance and reference materials have been moved to the appendices. **Appendix A** provides a glossary of important terms used in the ICRMP

Update. The remaining appendices are separated into two main categories: **Appendices B through H** include information completed by the HIARNG in support of the ICRMP Update, such as the Record of Environmental Consideration (REC) and ICRMP Update review correspondence, planning level survey information (historic contexts, predictive models), and summaries of cultural resources investigations completed at various sites and training installations. It also lists identified archaeological sites, historic buildings, and structures printed from the ICRMP database; copies of agreement documents negotiated by the HIARNG with other stakeholders; copies of annual ICRMP Update reports submitted to NGB over the past five years; the ICRMP Update distribution list and contact information for stakeholders; and an appendix for internal use containing ICRMP and cultural resources management project funding requirements. **Appendices I through K** are primarily boilerplate text outlining current laws, regulations, and policies for cultural resources management; tools and guidance for the CRM; and sample documents (Status Tool for the Environmental Program [STEP] project catalog, Memorandum of Agreement, Army Environmental Database – Environmental Quality [AEDB-EQ] questionnaire, sample training brief, flyer regarding salvage of historic materials during construction projects).

The 12 required elements of an Army/ARNG ICRMP are listed in **Table 1-1**, along with information regarding where the element is found in the ICRMP Update.

Table 1-1. Twelve Elements of an Army ICRMP.

ICRMP Element	Location in ICRMP Update
Identification of all applicable legal requirements and procedures for integrating compliance between the various independent cultural resources legal requirements.	Appendices I–J
Identification, to the extent possible, of specific actions, projects, and undertakings projected over a 5-year period that may require cultural resources legal compliance actions.	Chapter 2
Development and implementation, as appropriate, of a cultural landscape approach to installations’ cultural resources management and planning.	Chapter 2, Appendix J
A planning level survey that includes existing information on cultural resources, development of or references to existing historic contexts, an archaeological sensitivity assessment or archaeological predictive model, and a listing of any NHOs associated with the installation.	Appendices C–D (planning level survey and description of known resources) Appendix F – NHOs

ICRMP Element	Location in ICRMP Update
<p>A plan for the actual field inventory and evaluation of cultural resources that is prioritized according to the inventory and evaluation requirements associated with specific installation compliance requirements, such as NHPA Section 106 undertakings, that could affect cultural resources.</p> <p>Any electronic spatial data produced by inventories shall conform to the Federal Information Processing Standards and spatial data standards for DoD to ensure that the spatial data are useable in various spatial data systems.</p>	Chapter 2
<p>Internal procedures for consultation, survey inventory evaluations, treatment, recordation, monitoring, emergency or inadvertent discovery, reporting, etc., tailored for the particular conditions and specific requirements at the HIARNG virtual installation. Interface requirements between the cultural resource management program and other program areas (including but not limited to natural resources management, ITAM, master planning, facilities and housing, and mission-related training and testing activities) should be identified. The coordination processes within the installation and between the installation; Department of the Army (HQDA); regulatory agencies; and the interested public should be defined.</p>	<p>Appendix J – Procedures</p> <p>Chapter 2 – Coordination</p> <p>Chapter 3 - SOPs</p>
<p>Provisions for curation of collections and records (36 CFR 79) that are associated with NHPA undertakings, and procedures to reduce the amount of materials that are accessioned and permanently curated by the HIARNG virtual installation.</p>	Chapter 2
<p>Provisions for limiting the availability of cultural resources locational information to protect resources from damage.</p>	Chapter 2
<p>Provisions and procedures for conducting an economic analysis and alternative use analysis on historic properties that are being considered for demolition and replacement.</p>	Appendix J
<p>Procedures to ensure NHOs are provided access to sacred sites and are consulted when future access may be restricted or when effects to the physical integrity of the sacred site may occur.</p>	Chapter 2, Appendix J
<p>Development of standard treatment measures for cultural resources.</p>	Chapter 3
<p>An estimate of resources required to execute the plan must have restricted access and be “For Official Use Only” due to the protection of government cost estimates.</p>	Appendix H

1.4 Information Gathering, Input, and Review for the Preparation of the ICRMP Update

The ICRMP Update is the HIARNG Commander's decision document for cultural resources management and specific compliance procedures. This ICRMP Update is an internal HIARNG compliance and management plan that integrates the entirety of the state's cultural resources program requirements with ongoing mission activities. It also allows for ready identification of potential conflicts between the HIARNG mission and cultural resources management through analysis of impacts from currently known mission actions and activities, and it identifies compliance actions necessary to maintain the availability of mission-essential properties and acreage.

All cultural resources will be viewed as having the potential to contribute information of value to various groups, including NHOs, the academic community, local historical societies, people whose ancestors settled the area, and many others. Under the NHPA, it is the responsibility of the HIARNG to take into account the effects of its actions on cultural resources and to avoid, minimize, or mitigate any impacts that might result from its actions. The HIARNG also has the responsibility to identify and evaluate cultural resources present within the virtual installation, both as a proactive measure for planning purposes and to better assess the needs of the resources. In addition, the SHPD and NHOs must have an opportunity to participate in the identification and management of the cultural resources at each HIARNG site and training installation, and the general public and other stakeholders should be offered the opportunity to participate as well. A NEPA review will be implemented for this ICRMP Update. The appropriate NEPA analysis document (REC) is included in Appendix B.

For these reasons, during the preparation of both the 2008-2012 ICRMP and this ICRMP Update, information and input was gathered from HIARNG personnel, agencies, and stakeholders to determine and resolve issues related to the management of cultural resources within the HIARNG virtual installation. This phase also included participation by any agency with jurisdiction by law or expertise (including the SHPD) and NHOs to obtain input early in the development process.

This ICRMP Update builds on the comments provided during development of the 2008-2012 ICRMP for the HIARNG, providing internal and external stakeholders with the opportunity to reexamine issues and procedures now that the first five-year ICRMP cycle has been completed. **Appendix B** provides copies of all review correspondence, as well as the implemented REC for this ICRMP Update. **Appendix F** includes a distribution list for the draft and final versions of this ICRMP Update. **Appendix G** provides completed copies of the annual updates.

1.5 Roles and Responsibilities

This section contains a list of HIARNG staff responsible for the implementation of the cultural resources management program and nonmilitary agencies and stakeholders that also have responsibilities to the program. Electronic links are created to AR 200-1 for a list of the individual HIARNG staff responsibilities. **Appendix F** contains the Points of Contact (POCs) for the NHOs and all other stakeholders.

Once the roles and responsibilities are established, there are opportunities to tailor the compliance process to operations and minimize impacts on the mission. PAs, under Section 106 of the NHPA, are a good tool that can be used to tailor NHPA compliance to installation-specific situations. Comprehensive Agreements (CAs) under NAGPRA can help minimize or avoid mandatory 30-day shutdown periods

where human remains might be discovered. The critical key to managing an effective cultural resources program is consulting early in project planning and maintaining open lines of communication with other involved entities.

1.5.1 Military Personnel Responsibilities

The Army, NGB, and HIARNG personnel have important responsibilities for the implementation and success of the cultural resources management program. Participants in the management of cultural resources include the following:

- ODEP: Carries out the Assistant Chief of Staff for Installation Management (ACSIM) Army staff function for the Army's Cultural Resources Management Program.
- NGB: NGB provides funding for cultural resources program projects and compliance actions and is the primary POC for installation requirements. The NGB reviews the ICRMP for legal sufficiency and works with the state ARNG to respond to comments from stakeholders (SHPD, NHOs, and interested parties). The commanding officer of NGB-ARE must sign the Finding of No Significant Impact (FNSI) after the ICRMP and EA have been through public review and comment periods under the NEPA, for the ICRMP and EA to be complete. NGB-ARE reviews all other legal documents (PAs, Memoranda of Agreement [MOAs], and CAs) for legal sufficiency, provides review of such documents by the ODEP/ACSIM, and is the primary signatory in addition to The Adjutant General (TAG).
- HIARNG Virtual Installation:
 - **Cultural Resources Manager:** As appointed in accordance with AR 200-1 d(1)(a), provides day-to-day management for cultural resources, helps ensure that all HIARNG virtual installation activities are in compliance with applicable cultural resources requirements, serves as a liaison between all persons involved in the ICRMP, writes the ICRMP or develops its statement of work, and implements the ICRMP.
 - **Conservation Manager:** Can provide background information concerning sites, environmental and geographic factors, surface disturbance, access, vegetation, wildlife, endangered species, wetlands, and other resources.
 - **Facilities Management Office:** Is responsible for doing minor maintenance and repairs to installation property. Both the shops and work order section should have the current inventory of cultural resources and should use the appropriate standards and techniques established for maintenance and repair of historic properties.
 - **Master Planner:** Should have the ICRMP as a component plan within the HIARNG virtual installation Master Plan and Design Guide.
 - **Engineers/Project Managers:** Should include time schedules for cultural resources consultation in their project design and delivery schedules. They might have a permitting system established for anyone who wants to dig on the installation. The CRM can review digging plans submitted to them or provide them with an inventory and map of all known archaeological sites.

- **Real property:** Primary source of data needed to determine if a building or group of buildings is eligible for the NRHP and should be coordinated with to track historic properties.
- **U.S. Property & Fiscal Office:** Is responsible for the financial management and accounting for the HIARNG virtual installation's funds. They will track any cultural resources funds and are a source of information on funding.
- **Contracting Office:** Will give advice on spending funds to accomplish the cultural resources program. The contract office should be made aware of any legal requirements or agreements for cultural resources to ensure that contracts are consistent with those requirements.
- **Judge Advocate General (JAG):** Will review MOAs, PAs, CAs, Plans of Action, and any other legally binding cultural resources documents for legal sufficiency. They can also interpret the various laws and regulations related to cultural resources management.
- **G3 Operations Office:** Allocate and schedule the use of training lands to units for field exercises. They should have the current inventory of cultural resources found on the training lands and should be provided information on any agreement documents, the ICRMP, CAs, and pertinent regulations that could impact training.
- **Public Affairs Office (PAO):** Can help find historic information concerning sites or activities and can assist in developing interpretive programs. The PAO can also assist in promoting the ICRMP to the public and the installation. The PAO can promote Historic Preservation Week activities to increase public awareness in May.

1.5.2 Nonmilitary Participants

This section summarizes the roles of the following nonmilitary participants:

Advisory Council on Historic Preservation: The ACHP issues regulations to implement Section 106 of the NHPA; provides guidance and advice on the application of its regulations, 36 CFR Part 800; oversees the operation of the Section 106 process; and approves federal agency procedures for substitution of ACHP regulations.

State Historic Preservation Officer: The SHPO reflects the interests of the state or territory and its citizens in the preservation of their cultural heritage. In accordance with Section 101(b)(3) of the NHPA, the SHPO advises and assists the ARNG in carrying out its Section 106 responsibilities. The SHPO also advises and consults in the development of an ICRMP (see **Appendix I**). The Hawaii SHPO is the Administrator of SHPD. If an NHO has assumed the responsibilities of the SHPO for section 106 on lands under Section 101(d)(2) of the NHPA, TAG shall consult with the NHOs, in lieu of the SHPO, regarding undertakings occurring on or affecting historic properties on these lands. The SHPD may participate as a consulting party if the NHO agrees to include SHPD.

Native Hawaiian Organizations: Section 101(d)(6)(B) of the NHPA requires the ARNG Commander to consult with any NHOs that attach religious and cultural significance to historic properties that could be affected by an undertaking. Such consultation shall be on a government-to-government basis and shall occur through the provisions of the NHPA and 36 CFR Part 800. It is the responsibility of TAG to identify Native Hawaiian organizations that shall be consulted pursuant to Section 106 of the NHPA (see Chapter 2 and **Appendices I and J**). OHA was incorporated under the laws of the State of Hawaii (16 U.S.C.

Section 470w (18)) and serves as a statewide NHO. OHA should also be consulted to find additional NHOs for Section 106 consultation.

Interested Parties and the Public: The installation shall seek and consider the views of the general public and any other interested parties regarding the development and implementation of the ICRMP (see **Appendix B**), including historic preservation organizations.

2. Cultural Resource Management Strategy

This chapter provides an overview of the HIARNG Cultural Resources Program, its successes and challenges over the past five years related to the implementation of the previous ICRMP, the status of Section 110 investigations at each site and training installation, and appropriate compliance and management activities for the next five years. In addition, HIARNG projects planned for the next five years that require cultural resources compliance and management activities are identified.

2.1 HIARNG Cultural Resources within the Virtual Installation

The HIARNG virtual installation includes 216 buildings/structures/ranges and 1252.83 acres within 16 HIARNG installations (see **Appendix D**). All but two of the sites and training installations discussed in this ICRMP Update are either federally owned or supported with federal funds. These include Readiness Centers (RC), Weekend Training Sites (WETS), Units Training Equipment Site (UTES), Regional Training Sites Maintenance (RTSM), Regional Training Institute (RTI), Combined Support Maintenance Shops (CSMS), Army Aviation Support Facilities (AASF), and Field Maintenance Shops (FMS). Kapaa RC and Keaau RC are supported by only state funds.

The inventory of cultural resources managed by the HIARNG includes 28 historic buildings/structures and 13 archaeological sites NRHP-listed or eligible. **Table 2-1** provides a list of the HIARNG sites and training installations with notes concerning the status of inventories and evaluations as stipulated under Section 110 of the NHPA. The majority of buildings and structures aged 50 years or older within the HIARNG real property inventory have been evaluated for National Register eligibility. Projects to inventory buildings and structures that have turned 50 years old, or that will turn 50 years old by 2013, were completed in December 2014. Archaeological surveys have been completed for 6 of the 15 HIARNG sites. The archaeological survey of Bellows RTI, Ft. Ruger, Keaukaha Military Reservation (KMR), Kekaha WETS, and Puunene RC is complete; and archaeological survey of Kalaeloa RC is 47 percent complete, with no future surveys recommended (Hammatt and Shideler 2012). Together, 1034.50 acres of the total 1097.97 acres, or 94 percent of areas within the HIARNG virtual installations that are accessible for archaeological survey (excludes acreage beneath buildings and pavement), have been surveyed. Of the surveyed acreage, 102.07 of 1097.97 accessible acres are federal lands; while 995.90 of 1097.97 of accessible acres are state lands. No resources of traditional, religious, or cultural significance to NHOs have been recorded on HIARNG lands; however, the HIARNG maintains an ongoing consulting relationship with interested NHOs to ensure that HIARNG actions do not adversely affect significant cultural resources. Installations in this ICRMP are presented by island, from Hawaii, Maui, Molokai, Oahu, to Kauai, southeast to northwest across the main Hawaiian Islands.

Table 2-1. Status of NHPA Section 110 Inventory and Evaluation.

Site/Installation, Island	Total Number of Buildings\Structures\ Ranges	# of Buildings Structures\Ranges 50 years or Older	# of Evaluated Buildings\Structures\ Ranges	# of eligible Buildings\Structures\ Ranges	Total Acreage	Total Acreage Surveyed	#of Identified Archaeological Sites	#of Archaeological Sites eligible
Keaau RC, Hawaii	4	2	2	1	3	0	0	0
Kealahou RC, Hawaii	6	3	3	2	4.25	0	0	0
KMR, Hawaii	54	35	29	1	509	509	13	12
Hilo AASF #2, Hawaii	8	0	0	0	8	0	0	0
Puunene RC, Maui	3	0	0	0	30	26.85	1	0
Ukumehame WETS, Maui	4	1	0	0	39.28	0	0	0
Kaunakakai RC, Molokai	6	2	2	0	2.52	0	0	0
Ft. Ruger, Oahu	40	25	25	18	325	325	0	0
Kalaheo RC, Oahu	33	13	11	4	147	43.6	0	0
RTI, Oahu	9	1	1	1	48	40	1	1
Wahiawa RC, Oahu	9	5	5	0	10	0	0	0
Waiawa Gulch UTES & RTSM Pearl City, Oahu	18	4	2	0	22	0	0	0
Wheeler Army Air Field (WAAF), Oahu	5	0	0	0	31	0	0	0
Hanapepe RC, Kauai	8	4	4	0	3.28	0	0	0
Kapaa RC, Kauai	3	2	2	1	2.5	0	0	0

Site/Installation, Island	Total Number of Buildings\Structures\ Ranges	# of Buildings Structures\Ranges 50 years or Older	# of Evaluated Buildings\Structures\ Ranges	# of eligible Buildings\Structures\ Ranges	Total Acreage	Total Acreage Surveyed	#of Identified Archaeological Sites	#of Archaeological Sites eligible
Kekaha WETS, Kauai	6	3	1	0	68	68	0	0
Totals*	216	100	87	28	1252.83	1012.45	15	13

*Refer to Appendix J for more detailed information and PRIDE data.

2.2 Management Actions

This section summarizes the specific actions required to manage the cultural resources under the stewardship of the HIARNG over the past five years and for the next five years. Cultural resources actions can include initiation or continuation of NHO consultation not related to a specific project, GIS cultural resource layer development, development of a cultural resources training and awareness program for non-CRM staff, CRM training, development of agreement documents, and fulfillment of federal curation requirements.

2.2.1 Summary and Results of the 2008-2012 ICRMP

The HIARNG has been proactive in achieving the statewide management actions in the 2008-2012 ICRMP. HIARNG hired a dedicated CRM. Internal coordination between Environmental, FMO, G3, and HIARNG staff and user groups has improved, and cultural resources have been integrated fully into the REC process. Consultation with SHPD, NHOs, and stakeholders has been initiated.

In addition to these broader actions, the 2008-2012 ICRMP outlined a number of training installation- and site-specific inventory and evaluation projects to be completed by 2012. A number of these projects have been completed as planned; the HIARNG will strive to complete the remaining projects during the period covered by this ICRMP (FY 2016-2021).

Table 2-2. Status of Management Actions from 2008-2012 ICRMP

Installation, Island	Management Action	Status
Statewide	Develop a curation plan and database for archaeological artifacts and cultural resource related records.	Still an action. This action is on-going and will be included in the 2016-2021 ICRMP.
Statewide	Educate HIARNG user groups of the cultural resources present at facilities to mitigate any impacts during training. Provide on-going training to HIARNG	Still an action. The CRM will disseminate power point training for cultural resources awareness, install signage at installations with

Installation, Island	Management Action	Status
	personnel in the form of cards, posters, and through EQCC meetings.	archaeological sites and brief HIARNG user groups at EQCC meetings.
Statewide	Fully disseminate the ICRMP to each facility.	Still an action. This action will be included in the 2016-2021 ICRMP.
Statewide	Review ICRMP Standard Operating Procedures (SOPs) with each facility.	Still an action. This action will be included in the 2016-2021 ICRMP.
Statewide	Complete evaluations for historic buildings to determine NRHP eligibility.	Completed. A historic building survey was completed in 2014 and will be contracted every 5 years.
Statewide	Develop Predictive Models for Archaeological Sensitivity	Action changed. The updated goal is to survey 100% of land, and include Archaeological Monitoring Plans when necessary.
Statewide	Distribute copies of all past and future cultural resource reports to NGB.	Action changed. Distribute copies of the 2016-2021 ICRMP and submit yearly updates to NGB for approval.
Statewide	Work with the Real Property Officer to determine lease and landholding agreements.	Action changed. Meet annually with Real Property Officer to update PRIDE data and future acquisitions and demolitions to include in ICRMP annual update.
Keaau RC, Hawaii	Mount ARPA signage and institute site monitoring. Conduct ethnographic research to determine origin of the grave. Map remaining graves and conduct stone rubbings.	No longer an action. Keaau cemetery is not on HIARNG property and therefore does not require signage, research or mapping.
Kealahou RC, Hawaii	Evaluate the Quonset Huts and the MVBS facility if slated for demolition.	Completed. The Quonset hut and MVBS were evaluated for historic eligibility.
KMR, Hawaii	Continue reconnaissance and inventory level surveys on the remaining acreage.	Completed. An archaeological Inventory Survey was completed in 2014.
KMR, Hawaii	Develop a buffer zone around State Site 21771 that includes interpretive signage and a path for access.	Still an action. Fence was erected and path was laid to the archaeological site. The 2014 archaeological survey identified more features. 2016-2021 actions are to expand the fence line and erect signage for all arch sites.
KMR, Hawaii	Institute a restoration study for the two 47 mm cannons.	No longer an action. ENV Funding does not allow for the restoration of cannons.
KMR, Hawaii	Evaluate the condition of buildings for restoration.	Action changed. Buildings were evaluated for historic eligibility.
Ft. Ruger, Oahu	Complete a mitigation plan for the relocation of the FJHQ from Ft. Ruger.	Action Changed. HQ relocation effects were considered in the 2011 EA for the Relocation of Units to Kalaheo RC.

Installation, Island	Management Action	Status
Ft. Ruger, Oahu	Declare Battery Harlow a Civil Engineering Monument. Garner grants for mounting of ARPA signage and set-up displays at Battery Harlow	No longer an action. Battery Harlow was denied listing as a Civil Engineering Monument in 2011 and has been closed to public access.
Kalaeloa RC, Oahu	Develop protective measures and signage for sinkholes. Conduct archaeological survey.	Completed. Archaeological survey completed in 2014. No signage necessary because no artifacts present. FMO to provide protective measures.
Kalaeloa RC, Oahu	Develop a Maintenance and Treatment plan for historic buildings.	Still an action. This action will be included in the 2016-2021 ICRMP.
RTI, Oahu	Hand clear/remove invasive plants on revetment and repair gunnite for possible adaptive reuse.	Action changed. Remove invasive species to reduce further degradation. No longer planned for adaptive reuse. Develop a rehabilitation plan.
RTI, Oahu	Mount signage of the history of the base and the revetment at RTI for educational protective purposes	Still an action. This action will be included in the 2016-2021 ICRMP.
Kekaha WETS, Kauai	Complete a subsurface inventory of areas of Kekaha Firing Range slated for expansion	No longer an action. Kekaha is no longer slated for expansion.
Puunene RC, Maui	Develop mitigation plan for destruction of pads and WWII remnants.	No longer an action. The HIARNG no longer plans to demo the pads or WWII remnants.
Paukukalo, Maui	Evaluate Quonset huts before demolition prior to move to MCRC.	No longer an action. Paukukalo is no longer on HIARNG PRIDE database.

2.2.2 Goals and Actions for the 2016-2021 ICRMP Update

Based on the analysis of successes and challenges associated with the implementation of the previous ICRMP, the HIARNG has prepared the following updated list of installation management actions to be completed over the next five years. To aid in implementing these management actions, the HIARNG has programmed a number of site and training installation-specific projects between FY 2016-2021.

Table 2-3. Management Actions for the 2016-2021 ICRMP Update.

Installation, Island	Management Action	Status
Statewide	Develop a curation plan and database for archaeological artifacts and cultural resource related records.	On-going
Statewide	Educate HIARNG user groups of the cultural resources present at facilities to mitigate any impacts. Provide on-going training to HIARNG personnel through power point presentations, awareness signage and briefs.	On-going

Installation, Island	Management Action	Status
Statewide	Develop a PA with the Hawaii SHPD regarding historic building maintenance and treatment to streamline the Section 106 process.	On-going
Statewide	Develop an external stakeholder consultation database to include agency, preferred contact method and specific undertaking for section 106 consultation	On-going
Statewide	Coordinate meetings with FMO and G3 regarding future projects involving ground disturbance and/or historic buildings.	On-going
Statewide	Notify SHPD, NHOs, and stakeholders of ground disturbing activities and or projects affecting historic buildings. Follow best management practices during ground disturbing activities, and follow inadvertent discovery procedures for archaeological, historical, or cultural deposits and human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	On-going
Statewide	Complete evaluations for historic buildings to determine NRHP eligibility every 5 years. Next survey in 2019.	On-going
Statewide	Survey 100% of HIARNG land for cultural resources, and include Archaeological Monitoring Plans when necessary.	On-going
Statewide	Locate and review any previous archaeological surveys on HIARNG installations to determine if future AISs are required. Digitally archive reports on Share Drive for future Section 106 consultations	On-going
Statewide	Fully disseminate the ICRMP to each facility and review ICRMP Standard Operating Procedures (SOPs) with each facility.	On-going
Statewide	Distribute copies of the 2016-2021 ICRMP to SHPD, NHOs and NGB. Submit yearly updates to NGB for approval	On-going
Statewide	Meet annually with the Real Property Officer to update PRIDE historical data and review future acquisitions and demolitions to include in ICRMP annual update.	On-going
Statewide	Hire a full-time GIS Specialist to aid in cultural resource management and complete missing cultural GIS data gaps.	Upon Funding
Kealahou RC, Hawaii	Conduct mitigation for the demolition of NRHP eligible Quonset Hut (Bldg 2) with the Hawaii SHPD	
KMR, Hawaii	Increase the buffer zone around State Site 21771 to include features discovered during the 2014 archaeological survey.	
KMR, Hawaii	Restore and maintain the historic nurse's cottage (Bldg. 3) with FMO funding.	

Installation, Island	Management Action	Status
KMR, Hawaii	Develop and install interpretive signage for the natural and cultural resources found at KMR	
KMR, Hawaii	Coordinate with the unit Commanding Officer (CO) and PAO to develop/fund protective measures for two 47 mm Japanese cannons.	
KMR, Hawaii	Continued maintenance on alien species overgrowth at all archaeological sites.	On-going
Puunene, Maui	Properly curate artifacts from Kanaio until further guidance to return artifacts to DLNR.	
Kaunakakai, Molokai	Coordinate with the unit Commanding Officer (CO) and PAO to develop signage for the historic Molokai cannon as well as protective measures.	
RTI, Oahu	Develop worklines to remove invasive species and restore the historic WWII revetment	
Ft. Ruger, Oahu	Conduct a HABS III Survey on Bldgs 301 and 304 to mitigate for the land transfer of Ft. Ruger to DLNR and possible demolition of buildings.	
Kalaeloa RC, Oahu	Develop a list of repair and maintenance projects to consult with SHPD and NHOs.	
Wahiawa, Oahu	Coordinate with the unit Commanding Officer (CO) and PAO to develop/fund protective measures for Battery Hulings and wheeled cannon.	

2.2.3 Cultural Resources Compliance, FY 2016-2021 Undertakings

In addition to the management actions and installation-specific projects noted in section 2.2.2, this section outlines projects initiated by other directorates within the HIARNG, requiring cultural and/or historic compliance. Projects are listed in chronological order in the next 5 years (see **Table 2-5**) and beyond five years (see **Table 2-6**). The CRM must develop projects and documents for the identification and protection of cultural resources and compliance actions needed when resources could be affected. Cultural resources compliance actions can include archaeological or historic building surveys, consultation with the SHPD, impacts mitigation, arranging for and agreements with curation facilities, initiation of Section 106 consultation related to a specific project, or development of agreement documents for a specific project. These projects might be necessary due to mission changes or master planning initiatives or might be a part of ITAM projects; natural resource management plans; major maintenance programs; changes in equipment, assets, mission, or training; and consolidating or relocating units. The projects listed in Table 2-5 and Table 2-6 have the potential to require consultation with the Hawaii SHPD, NHOs and other interested parties for either ground disturbance or historic building maintenance and repair. Project managers will follow best management practices and all pertaining ICRMP SOPs.

Table 2-4. Projects Requiring Section 106 Consultation Planned for FY 2016-2021.

PN	FY	Description of Undertaking	Project Manager/POCs
15110011	FY15	Kalaeloa RC B46 Reno Ph2 - Construction (75%/25%)	
	FY15	Kalaeloa RC Entry Guard Booth, Fence & Gate Replacement - Construction (75%/25%)	
15130009	FY15	Kalaeloa RC Storage, B129 - Construction DB (75%/25%)	
	FY15	Kalaeloa RC Stormwater SW1 - Construction (75%/25%)	
	FY16	Hanapepe FMS Shop - Construction & Equipment (100%)	
	FY16	Kalaeloa RC B19 Parking – Construction	
	FY16	Kalaeloa RC B282 Renovation Ph1 - Construction & Equipment (75%-25% 2065)	
	FY16	Kalaeloa RC Perimeter Fence Replacement - Construction DB (75%/25%)	
15160002	FY16	Kalaeloa RC Potable Water P3 - Construction (75%/25%)	
15160003		Kalaeloa RC Wastewater W3 - Construction (75%/25%)	
	FY16	Waiawa Gulch UTES & RTSM Electrical Replacement & Grading - Construction (75%/25%)	
	FY16	Waiawa Gulch UTES & RTSM Add/Alt - Construction (100%)	
	FY17	Kalaeloa RC Electrical E3 - Construction (75%/25%)	
	FY17	Kalaeloa RC Stormwater SW2 - Construction (75%/25%)	
	FY18	Kalaeloa RC B282 Renovation Ph2 - Construction & Equipment	
	FY18	Kalaeloa RC Non-Potable NP1 - Construction (75%/25%)	
15170002	FY18	Kalaeloa RC Potable Water P4 - Construction (75%/25%)	
15170003	FY18	Kalaeloa RC Wastewater W4 - Construction (75%/25%)	
	FY19	Kalaeloa RC B1784 Reno - Construction & Equipment (75%/25%)	
	FY19	Kalaeloa RC Non-Potable NP2 - Construction (75%/25%)	
	FY19	Kalaeloa RC Recreational Parking Lot - Construction (75%/25%)	
	FY19	Kalaeloa RC Stormwater SW3 - Construction (75%/25%)	

PN	FY	Description of Undertaking	Project Manager/POCs
	FY20	Kalaeloa RC B282 Renovation Ph3 - Construction & Equipment (75%/25%)	
	FY20	Kalaeloa RC Stormwater SW4 - Construction (75%/25%)	
	FY20	Kalaeloa RC Wastewater W5 - Construction (75%/25%)	
	FY21	Kalaeloa RC Non-Potable NP3 - Construction (75%/25%)	

Table 2-6. Project Requiring Section 106 Consultation Planned Beyond 2021.

PN	FY	Description of Undertaking	Project Manager/POCs
	FY22	Kalaeloa RC Non-Potable NP4 - Construction (75%/25%)	
	FY22	Kalaeloa RC Stormwater SW5 - Construction (75%/25%)	
	FY23	Kalaeloa RC Non-Potable NP5 - Construction (75%/25%)	

As noted above, guidance for developing and implementing the projects and protecting resources is included in **Appendix J**. An internal cost estimate for the projects listed in section 2.2.3, for NGB review only, is provided in **Appendix H**.

2.3 Cultural Landscape Approach

Cultural resources constitute significant elements of the ecosystems in which Army installations and their component activities exist and function. Planning and management of cultural resources should occur within the context of a comprehensive and integrated land, resource, and infrastructure approach that adapts and applies principles of ecosystem management. This involves the planning and management of cultural resources by reference to the landscape.

The development and implementation, as appropriate, of a cultural landscape approach to HIARNG installation management is required by AR 200-1. A cultural landscape approach:

1. Analyzes the spatial relationships among all cultural resources within their natural setting. Installation cultural resources management planning occurs through installation ICRMPs and can be facilitated by installation GIS, if available.
2. Serves as an organizing principle to record the landscape in a manner that incorporates the complexity of human cultural interaction with the natural terrain through time. Military installations are treated as an integral entity with interrelationships existing among the natural and cultural resources present. Military operations are treated as one, albeit one of the most significant, of a number of human cultural activities that have influenced the installation cultural

landscape. The intent of this approach is to fully integrate cultural resources management with military training, testing, and infrastructure operations.

3. Recognizes that cultural resources may be present on installations because of, or may even be a result of, continuous military occupation and use of the land. Landscapes on any Army installation have all been affected to some degree by human activity. Prehistoric and historic archeological resources, historic buildings, structures and districts, sacred sites, endangered species habitat, wetlands, riparian areas, and other components of the ecosystem have been influenced, maintained, or created by prehistoric and historic human occupants and modern military use of the land. All of these natural and man-made features, including those related to military operations, are viewed as a series of surface and subsurface features that make up the installation's cultural landscape.
4. The cultural landscapes on military installations are unique because there are no other landscapes in this nation that have evolved from a continued use for defense-related purposes. Therefore, there must be functional continuity. Military training and testing and other defense related activities must continue to occur to maintain and to allow the military cultural landscape to continue to evolve. As a resource category, a "cultural landscape" (see **Appendix J**) can be determined eligible for inclusion in the NRHP.

The HIARNG Cultural Resources Program has implemented the cultural landscape approach in several ways:

- Use of GIS to create cultural resources data layers that are integrated within the geodatabase for each site and training area; these layers allow planners to view cultural resources as integrated with natural resources and infrastructure elements within the landscape.
- Integration of cultural resources planning efforts with the virtual installation Master Plan.
- Development of predictive models and historic contexts to inform planners of past land use patterns.
- Development of creative approaches to cultural resources management that provide training opportunities.
- Cultural landscape approach and analysis of HIARNG facilities and installations in 2009 (engineering-environmental Management, Inc. [E²M]), archaeological survey at KMR (Wheeler et al. 2014), and historic building survey at five HIARNG installations on Kauai, Oahu, and Hawaii (Blackwell and Barnes 2014).
- Cultural landscape approach incorporated into future cultural resources projects.
- Update of cultural resources data layers in 2016-2021 ICRMP.

2.3.1 GIS

HIARNG GIS data was developed to create a cultural resources management tool and a common or shared GIS database. The geodatabase consists of HIARNG managed feature classes (i.e installation boundaries, facilities, cultural resources, and infrastructure) and state or federal managed feature

classes (i.e. geology, ecology, transportation, and land use). The latter datasets were acquired from the State of Hawaii Office of Planning Hawaii Statewide GIS Program (<http://planning.hawaii.gov/gis/download-gis-data/>) and imported into the HIARNG geodatabase.

Prior to the development of the current ICRMP, the HIARNG personal geodatabase consisted of 18 feature classes. The structure of the geodatabase was revised to comply with Spatial Data Standards for Facilities, Infrastructure, & Environment (SDSFIE) 2.6 model and incorporated new cultural data acquired from HIARNG staff and the State Historic Preservation Division (SHPD). The SDSFIE compliant geodatabase contains 26 feature classes within 11 feature datasets (see **Table 2-7**). All metadata conforms to the Content Standard for Digital Geospatial Metadata (CSDGM) adopted and revised by the Federal Geographic Data Committee (FDDC).

Table 2-6. HIARNG Geodatabase.

3. Feature Dataset	4. Feature Data Class	5. Type
building		
	canopy_pavilion_area	polygon
	fence_line	line
	gate_line	Line
	shed_area	polygon
	slab_area	polygon
	structure_exisiting_area	polygon
cadastre		
	installation_area	polygon
cultural		
	archaeological_artifact_point	Point
	cultural_survey_area	polygon
	historic_feature_area	polygon
	historic_feature_point	Point
	historic_structure_area	polygon
	historic_structure_point	Point
	terrest_archaeological_area	polygon
	terrest_archaeological_line	Line
ecology		
	land_vegetation_area	polygon
	wetland_area	polygon
geology		
	geologic_feature_point	Point
improvement_general		

3. Feature Dataset	4. Feature Data Class	5. Type
	wall_line	Line
landform		
	survey_traverse_line	Line
	survey_traverse_point	Point
soil		
	soil_survey_area	polygon
transportation_vehicle		
	road_area	polygon
	vehicle_parking_area	polygon
transportation_air		
	airfield_surface_area	polygon
transportation_air		
	pedestrian_sidewalk_area	polygon

Previous GIS information pertaining to cultural resources was limited to the boundaries of the Ft. Ruger historic district. While cultural surveys and environmental assessments note additional resources within the virtual installation, the locations of the surveys and resources were not previously recorded within the GIS database. Nine new feature classes were created in the geodatabase, and the location of historic structures, historic features, cultural surveys, and archaeological sites were located and imported into the appropriate feature class. The cultural dataset includes the location of 19 cultural surveys, 20 historic features, 92 historic structures, 7 archaeological sites, and the Ft. Ruger Historic District. While the geodatabase has been updated, many data gaps still exist.

The GIS data used to create the current geodatabase contained data gaps in both the vector data and attributes tables that were imported into the current database if no information was available to correct the error. Installation boundaries were corrected for all HIARNG holdings except Ft. Ruger. The Ft. Ruger boundary is based on several reports and initial GIS data provided by HIARNG. Structure data that could not be corrected was also imported into the buildings feature dataset. Data gaps within the attributes table for existing structures include 26 unidentified facilities, 174 records without building or occupation dates, and 278 facilities that contain no description or were misidentified buildings. Additionally, several buildings appear on aerial photography without a listing in the database. Furthermore, some buildings have been demolished but are still listed as existing.

The cultural data also includes several gaps including missing vector data and incomplete attribute tables. Gaps in the vector data include locations of previous surveys, archaeological sites, and traditional cultural places, facilities, and recovered artifacts. Several surveys were missing in both the HIARNG and DLNR SHPD libraries. They are noted in report bibliographies but could not be located. Archaeological site forms containing location and diagnostic data were also missing in the libraries and could not be mapped. Missing attribute data, most likely contained in the missing reports and site forms, includes eligibility determinations for archaeological sites and structures over 50 years old, archaeological site size and depth, recovered artifact location information, and exposed features. Attribute data pertaining to management recommendations for NRHP eligible structures and

archaeological sites are also missing from the GIS database. Completing the missing cultural GIS data gaps is recommended as a management action for 2016-2021.

2.3.2 Sustainability Initiatives

HIARNG practices environmental stewardship and is working toward the goal of environmental sustainability. Through efforts in conservation, compliance, and land management, HIARNG is moving from environmental compliance to sustainability. Sustaining resources, continuing previous goals, enhancing training, and integrating environmental sustainability are part of the strategy to secure the future for Hawaii's youth, members of the Guard, and the public.

2.4 Coordination and Staffing

Cultural resources compliance requirements must be completed prior to implementation of mission-essential programs, projects, and training. Integration and coordination among HIARNG offices can be very challenging. Installation program managers (including conservation, compliance, facility management, training, safety, public affairs, logistics) manage multiple programs, and it can be difficult to communicate with other offices on a regular basis. To effectively manage a Cultural Resources Program, coordination is absolutely essential. Other offices need to be aware of the cultural resources program's responsibilities. The CRM also must be aware of the activities of other installation offices that could potentially impact cultural resources. Lack of proponents for cultural resources could ultimately result in insufficient funding for the program.

An effective CRM should:

1. Understand the military mission.
2. Have or acquire an inventory of archaeological resources with locations and maps. This must be closely controlled and discussed on a case-by-case manner.
3. Have a clear understanding of how their job supports the military mission.
4. Review proposed programs and projects to determine necessary compliance.
5. Align cultural resources compliance with NEPA requirements whenever possible.
6. Work on gaining proponents for cultural resources management up the chain of command.
7. Know what other installation offices are doing, explain cultural resources responsibilities, and discuss potential impacts on cultural resources.
8. Coordinate and consult with outside entities including the SHPD, NHOs, and local interest groups, as mandated in the NEPA, NHPA, DoDI 4710.02, AR 200-1, and other laws and regulations summarized in **Appendix I**. Neglecting to consult with these interested parties early in the planning process could result in unnecessary tension, which will cause delays that translate into government time and cost. **Recent legislation (36 CFR 800, NAGPRA) has strengthened responsibilities to consult with NHOs.**

2.4.1 Internal HIARNG Coordination and Staffing Overview

Coordination and staffing procedures are critical for activities such as construction; long-range planning; building repair, maintenance, or renovation; and planning and execution of mission training or other

mission-essential activities. Coordination is also critical for cultural resources stewardship and compliance. Actions that typically trigger internal coordination and compliance include but are not limited to:

- Building maintenance and repair
- Landscape and grounds repair or replacement
- New construction – buildings or additions, infrastructure, roads, and trails
- Major renovations to buildings
- Major changes in use of buildings
- Major changes in training locations or type
- Master planning
- Divesting of property
- Demolishing buildings or structures
- Leasing or using private or public property
- Emergency operations
- Compliance with Anti-Terrorism Force Protection requirements

Chapter 1 introduced the internal stakeholders and review requirements for development of the ICRMP. **Table 2-8** lists internal stakeholders and their responsibilities and involvement in the cultural resources program.

Table 2-7. Internal Stakeholder Coordination.

Internal Stakeholder	Interface with Cultural Resources Program and CRM
Leadership – TAG, DAG, CG, Joint Staff	<ul style="list-style-type: none"> ▪ Provide leadership support to the cultural resources program. Through review and signing of ICRMP, determines the cultural resources policy and procedures for the HIARNG. ▪ Participate in cultural resources awareness training.
ENV, FMO	<ul style="list-style-type: none"> ▪ Have the ICRMP as a component plan within the installation Master Plan and Design Guide. ▪ Provide project and program information to the CRM for review during planning stages. ▪ Include time schedules for cultural resources compliance. ▪ Have the current inventory of cultural resources. ▪ Invite CRM to planning and project meetings. ▪ Have a permitting system established for anyone who plans to dig

Internal Stakeholder	Interface with Cultural Resources Program and CRM
	<p>on the installation. The CRM shall review digging plans submitted to them, or provide them with an inventory and map of all known archaeological sites.</p> <ul style="list-style-type: none"> ▪ Provide background information concerning facilities, environmental, and geographic factors, surface disturbance, threatened and endangered species, wetlands, and other sensitive natural resources to the CRM. ▪ Have quarterly meetings with project managers to ensure timely communication about upcoming or proposed projects.
USPFO	<ul style="list-style-type: none"> ▪ Should have the ICRMP as a component plan within the installation Master Plan and Design Guide. ▪ Should have the current inventory of cultural resources, and discuss upcoming project with the CRM to ensure timely compliance. ▪ Invite CRM to planning and project meetings. ▪ Participate in cultural resources awareness training.
G3	<ul style="list-style-type: none"> ▪ Should have the ICRMP as a component plan within the installation Master Plan and Design Guide. ▪ Should have the CRM review master / strategic plans and training plans. ▪ Should include time schedules for cultural resources compliance and any necessary tribal consultation in implementation of plans and training. ▪ Invite CRM to planning and project meetings. ▪ Participate in cultural resources awareness training.

Construction or military mission activities can adversely affect cultural resources. Each HIARNG staff member involved with planning, construction, building repair, or maintenance or management of training or other mission activities should coordinate with the CRM in the planning process. Analysis of effect should be done prior to NEPA implementation or, at the latest, during the scoping phase for the appropriate NEPA document; this analysis can be coordinated with the Section 106 review process to help streamline the process but requires early and constant coordination. Analysis should commence with the submission of a Military Construction (MILCON) request for funding (DD Form 1390/91) or initial identification of a need for a project/training exercise. If the action qualifies for a NEPA Categorical Exclusion (CATEX), be sure that all NHPA requirements have been resolved, or that there are no historic properties affected by the proposed action. If properties are affected by the project or training exercise, and the affects have not been mitigated through an MOA, then an EA and MOA are required. For more detailed guidance, refer to the NGB NEPA Handbook or contact NGB-ARE Cultural Resource Specialists or NEPA Program Managers.

To facilitate integration of planning and analysis of effects between stakeholders, the CRM will:

- Distribute the ICRMP Update to and solicit input from internal stakeholders.

- Discuss the compliance actions proposed in response to MILCON and other projects listed in chapter 2 (and Appendix H), and emphasize time requirements to complete these actions in advance of the undertakings.
- Distribute SOPs to applicable parties (see Appendix F).
- Distribute list of historic structure and archaeological sensitivity maps.
- Develop and conduct cultural resources awareness training.
- Meet, at a minimum, once per year but preferably once per month with FMO to discuss upcoming projects and plans.
- Attend the EQCC meetings.
- Participate in staff meetings, as appropriate.

The CRM should contact the above personnel to determine if they understand the cultural resources management program, and periodically interface with these individuals on updates and as new HIARNG mission-essential plans and programs are developed. The key is to establish relationships so that internal stakeholders will notify the CRM of project changes and upcoming projects.

Timing: Coordination should be ongoing. The sooner the CRM is involved in the planning and project process, the more likely the process will continue without interruption and delays. Projects involving Section 106 consultation and stakeholder involvement should be identified as early as possible.

2.4.2 External Coordination (Agencies and Stakeholders) Overview

Coordination with non-HIARNG entities is required under several federal laws and regulations and AR 200-1. The NHPA, NEPA, and Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) require coordination with interested parties and other government agencies, depending on the action involved.

External agencies and stakeholders that might be involved in cultural resources management include:

- SHPD
- NHOs
- ACHP
- Departmental Consulting Archaeologist, National Park Service
- Keeper of the National Register, Department of the Interior
- Interested members of the public, including ethnographic groups, historic organizations, and others

The HIARNG will comply with all pertinent laws and regulations concerning the management and preservation of cultural resources and will, where appropriate, consult with the SHPD, NHOs, the ACHP, and interested persons, as required:

- To comply with NHPA Section 106.
- To comply with NEPA, when the NHPA Section 106 requirements are integrated into the NEPA process.
- In accordance with the NHPA, if the HIARNG and the SHPD come to a disagreement regarding NRHP eligibility recommendations, the Keeper of the National Register can be consulted. Guidance on preparing a determination of eligibility can be found at 36 CFR Part 62.3 (d).
- In accordance with the NHPA, if the HIARNG and the SHPD come to a disagreement regarding the Section 106 process, the ACHP may assist. The HIARNG must also invite the ACHP to participate in consultations regarding the resolution of adverse effects to historic properties.
- In accordance with the NHPA, NAGPRA, Archeological Resources Protection Act (ARPA), and NEPA, the CRM shall coordinate with interested NHOs (see Appendices F and J).
- In accordance with the NHPA, the CRM will consult with the National Park Service for all Section 106 undertakings that have the potential to affect a National Historic Landmark.

Timing: SHPD, NHOs and public reviews will generally require a minimum of 30 days for Section 106 reviews of determination of effects. A thorough Memorandum for Record (MFR) of contact with SHPD and NHOs must be kept for these conversations.

2.5 Consultation with Native Hawaiian Organizations

On 25 October 2011, the DoD promulgated its annotated Consultation Policy with NHOs, which emphasizes the importance of respecting and consulting with NHOs. The policy requires an assessment, through consultation, of the effect of proposed DoD actions that may have the potential to impact areas of traditional religious and cultural importance before decisions are made by the services. *DoDI 4710.03* provides additional guidance for this policy. If it appears that there might be an effect, the appropriate NHOs would be contacted. **Appendix F** provides POC information for NHOs that have known affiliations with lands under HIARNG control.

2.5.1 Status of Consultation

The HIARNG has been an active consultation partner with NHOs, primarily the Office of Hawaiian Affairs, Hui Malama I Na Kupuna 'O Hawai'i Nei, and the Island Burial Councils whose function is to assist with human remains found on state lands.

Recently, HIARNG has reconnected with its consultation partners and invited additional NHOs and external stakeholders (see **Table 2-9**) to consult on proposed undertakings statewide and at each site and installation, including the 2016-2021 ICRMP. This list of NHOs and external stakeholders should be updated as contacts are made.

Table 2-8. NHOs and External Stakeholder Invited to Consult.

NHOs and External Stakeholders	Response/Contact Method
Ahahui Siwila Hawai'i O Kapolei Lance Holden	Consult on Kalaeloa – Kaleo Keawe-Aiko
Aha Kane G. Umi Kai	
Ahu Moku O Kahikinui Donna D. Sterling	
Ahu Moku Maui Inc. Ke'eaumoku Kapu	
Aha Wahine Linda Kaleop Paik	
Ahupua'a o Moloka'i Kammy Purdy	
Aloha First Dennis Kanahale	
Association of Hawaiian Civic Clubs Soulee LKO Stroud	
Association of Hawaiians for Homestead Lands Blossom Feieria	Return to Sender
Au Puni O Hawai'i Samson L. Brown	
Brian Kaniela Nae'ole Naauao Brian Kaniela Nae'ole Naauao	
Charles Pelenui Mahi Ohana Maydean K. Bowman	
Council for Native Hawaiian Advancement Napali Woode	
Diamond Head Citizens Advisory Committee/ Friends of Diamond Head	
Four Points Global Services Corp. Howard N. Joy	
Friends of Iolani Place Kippen de Alba Chu	
Friends of Moku'ula Blossom Feiteira	Consult on Puunene and Ukumehame
George K. Cypher Ohana	

NHOs and External Stakeholders	Response/Contact Method
Mahealani Cypher	
God's Country Waimānalo Ilima Ho-Lastimosa	
Hau'ouiwi Homestead Association on Lanai Winifred Basques	
Hawaiian Maoli Henry Gomes	
Hawaiian Civic Club of Hilo Antoinette K. Mallow	
Ho Ohana Ilima Ho-Lastimo	
Hookano Family Land Trust Dawn N.S. Chang	
Hui Hooniho Edward Halealoha Ayau	
Hui Huliau Adrian Silva	
Hui Kakoo Aina Hoopulapula Kaipo Kinkaid	Return to sender
Hui Kaleleiki Ohana Jaynie I. Stone	
Hui Malama I Na Kupuna O Hawai'i Nei Edward Halealoha Ayau	
Kakoo Oihi Mahealani Cypher	
Kalaaloa Heritage and Legacy Foundation Melissa M. Lyman	
Kalamaula Mauka Homestead Association Victoria Kapuni	Return to sender
Kamealoha Thomas Kamealoha	
Kamehameha Schools Piilani Hanohano	
Kamiloloa One Ali'i Homestead Association Vivian L. Ainoa	
Kanu o ka aina Learning Ohana Taffi Wise	

NHOs and External Stakeholders	Response/Contact Method
Kapolei Community Development Corporation Shirley S. Swinney	
Kapolei Hawaiian Civic Club Lance Holden	
Kawaihapai Ohana Thomas T. Shira Jr.	Consult on Wahiawa, Waiawa, Ft. Ruger, Kalaeloa
Keoni Kealoha Alvarez Keoni Kealoha Alvarez	
Koolau Foundation Mahealani Cypher	
Koolaupoko Hawaiian Civic Club Mahealani Cypher	
Lahui Kakaikahi Kaleo Keeno	
Lai Opua 2020 Craig V. Kahui	
Ma'a Ohana c/o Lani Ma'a Lapilo Lani Ma'a Lapilo	Return to sender
Machado-Akana-Aona-Namakaeha Ohana Brenda Luana Machado Lee	
Mahu Ohana Keona Mark	
Makaha Hawaiian Civic Club Lu Faborito	
Makuu Farmers Association Paula K. Kekahuna	
Maluohai Residents Association Homelani Schaedel	Consult on Kalaeloa
Meleana Kawaiaea LLC Paul Richards	
Moku o Kaupo Jade Alohalani Smith	Consult on all federal land undertakings
Na Aikabe O Maui Uilani Kapu	
Na Kuauhau o Kahiwakaneikoolei H. Kanoeokalani Cheek	

NHOs and External Stakeholders	Response/Contact Method
Na Ohana o Puaoli a me Hanawahine Roxanne Hanawahine	
Nanakuli Housing Corp Paige Kapiolani Barber	
Native Hawaiian Church Kaleo Patterson	
Native Hawaiian Economic Alliance Napali Woode	
Native Hawaiian Education Council Wendy Hee	Decline to participate
Nekaifes Ohana Maraea K. Nekaifes	
O'ahu Island Burial Council Shad Kane	Consult on cultural, NAGPRA, digging
Office of Hawaiian Affairs Kamana'opono M. Crabbe	Consult on cultural, NAGPRA, digging
Ohana Keaweamahi Paulette Kaleikini	Consult on NAGPRA
One Ali'i Homestead Association Vivian L. Aiona	
Pacific American Foundation Herb Lee	
Pacific Justice & Reconciliation Center Kaleo O Patterson	
Papa Ola Lokahi Hardy Spoehr	
Papakolea Community Development Corporation B. Puni Kekauoha	
Paukukalo Hawaiian Homes Community Association Olinda Aiwohi	
Peahi Ohana ApelaPeahi	
Piihonua Hawaiian Homestead Association Kaleo Aki	Consult on all undertakings
Royal Hawaiian Academy of the Traditional Arts L. Laakea Sukanuma	
The Friends of Hokulea and Hawaiiiloa	

NHOs and External Stakeholders	Response/Contact Method
William K. Richards Jr.	
The I Mua Group Melvin Soong	
Waianae Hawaiian Civic Club Mele Worthington	
Waiehu Kou Phase 3 Association Roy Oliveira	
Waimānalo Hawaiian Homes Association	

2.5.2 Development of the ICRMP and ICRMP Updates

The HIARNG must consult with affected NHOs representatives (on a government-to-government basis) in the development of the ICRMP and subsequent ICRMP Updates. The HIARNG must take into account the views of NHOs in reaching a final decision. Unless protocols have been established between the HIARNG and a specific NHO allowing direct contact between the CRM and NHOs or other designated representative, all correspondence from the HIARNG to NHOs should be sent from the TAG or Chief of Staff. Depending on the response received from each NHO, the HIARNG will provide copies of the draft and final ICRMP or ICRMP Update to the NHOs for review and comment. Again, a cover letter from the TAG or Chief of Staff addressed to the NHOs should be included with all such review requests.

2.5.3 Ongoing CRM Responsibilities

CRMs should maintain a file or binder containing the following information relating to the HIARNG's consultation program to date. The file should include:

- Summary of past consultation activities (meetings)
- Letters and memorandums for records
- Planned future consultation
- Point of contact list
- Any agreement documents

The file should be updated as necessary to include MFRs, meeting agendas and summaries, updated POC lists, and agreement documents.

- The POC list in the file and in the ICRMP (Appendix F) should be updated whenever new information becomes available. At a minimum, the list should be checked annually. Updates can be entered into the POC table of the ICRMP database, and a report can be printed for inclusion in the appendix. The CRM can call/access the following resources for update information:

- Department of the Interior's website (<http://www.doi.gov/ohr/nholist/nhol.cfm>)
- SHPD
- NHOs
- Office of Hawaiian Affairs Web page
- Other federal or state agencies, including the state Department of Transportation

2.6 Curation

Materials or artifacts collected as a result of archaeological investigations or heritage assets on HIARNG installations are curated at KMR, Puunene, Kaunakakai, and Wahiawa. The following management actions are recommended for curation at HIARNG installations.

- Initiate project to inventory, catalog, curate and archive, display, interpret, and store HIARNG collections (including cannons) at facilities statewide.
- Creation of cultural resources artifact and records database.
- Ensure HIARNG compliance with 36 CFR 79 and AR 870-5.
- Artifact and cultural resources displays used in education, interpretation activities, and public access.
- Wahiawa RC, Oahu - Statewide management action for curation and interpretation of HIARNG collections will include historic cannons at Wahiawa.
- Puunene RC, Maui - Statewide management action for curation and interpretation of HIARNG collections will include collections from site 50-50-14-4740 at Puunene.
- Kaunakakai RC, Molokai - Statewide management action for curation and interpretation of HIARNG collections will include historic cannon.
- KMR, Hawaii - Statewide management action for curation and interpretation of HIARNG collections will include artifacts from 50-10-35-21771, the Japanese cannons, and any collections from current archaeological survey.
- KMR, Hawaii - Selected artifacts from 50-10-35-21771 collection and reproduction of the original gallery tags may be displayed in the cases in the lobby of Bldg. 643A.
- KMR, Hawaii - Displays in Bldg. 643A used to train users of the KMR training lanes.

HIARNG facilities meet the standards outlined in 36 CFR 79. Requirements for curating items at HIARNG facilities are included in **Appendix E**. Also see **Appendix J** for curation facility requirements. For a curation facility to meet the requirements of 36 CFR 79, it shall:

- *Provide access to, loan, and otherwise use collections*

- *House collections from similar geographic regions or cultural areas*
- *Be able to accession, label, catalog, store, maintain, inventory, and conserve collections on a long-term basis*
- *Use professional museum and archival practices*
- *Maintain complete and accurate records of the collection*
- *Provide space for storage, laboratory, study, and exhibition*
- *Keep the collection under physically secure conditions, including climate control for all materials and associated records*
- *Maintain a fire detection and suppression system*
- *Maintain a pest control system*
- *Have an adequate security system to limit access*
- *Have an adequate emergency management plan with established procedures for responding to fires, floods, natural disasters, etc.*
- *Have personnel on staff who are qualified museum professionals*
- *Store associated records in a secure manner to protect them from fire, theft, etc.*

In general, artifacts from archaeological contexts recovered from HIARNG lands are treated as federal or state property, depending on land ownership and whether federal funding was involved for the investigation that recovered the artifacts. Where human remains and grave associated artifacts are involved, however, CRMs must follow the procedures outlined in NAGPRA to repatriate such remains and objects to the appropriate NHOs or living descendants, if they can be identified.

Statewide Curation project will record the number of cubic feet of collections and linear feet of records curated at each facility. Archaeological and cultural collections are recommended to remain at individual installations, curated in place, and compliant with 36 CFR 79. Other long-term curation options will be investigated including curation and loan agreements.

There are also other records, memorabilia, recent or historic artifacts, artwork, and donated private collections that are associated with the HIARNG's military history and stored at each installation.

In general, items relating to the HIARNG's military history are the responsibility of the HIARNG's historian or History Detachment rather than the CRM. National Guard Regulation (NGR) 870-20 "Army National Guard Museums, Museum Activities, and Historical Property" and its associated regulation AR 870-20 "Military History: Responsibilities, Policies, and Procedures" outline the policies applied to these types of items. AR 870-20 and NGR 870-20 can be found online at:

http://www.army.mil/usapa/epubs/CMH_1.html (AR 870-20)

http://www.ngbpdc.ngb.army.mil/pubs/870/ngr870_20.pdf (NGR 870-20)

Under NGR 870-20, a historical collection is defined as:

- (1) A collection of artifacts displayed in a regimental room, trophy room, armory, visitor's center, exhibit area, or other type of display, not recognized by the US Center for Military History as a museum or museum activity.

- (2) A collection of historical artifacts (including archaeological artifacts) secured, preserved, accounted for, and stored on an installation.
- (3) A collection of historical artifacts in an officers' club, non-commissioned officers' club, chapel, lobby, headquarters building, or armory.
- (4) A collection of artifacts such as tanks, artillery, vehicles, aircraft, or other items that are displayed in front of buildings (including armories), on a parade ground, at an airfield, in parks, or at other locations around the State.

NGR 870-20 also specifies the roles of CRMs and historians in regards to collections:

The State/installation Environmental Program Manager will advise the museum director/curator regarding archaeological artifacts and other items relating to Native Hawaiians. IAW provisions of AR 200-1, the Environmental Program Manager, in turn, will consult with the installation's Cultural Resources Manager and the Coordinator of State Historic Preservation Division and associated NHOs on the applicability of cultural resources laws and regulations.

NGR 870-20 also provides the following guidance regarding archaeological collections:

Archaeological remains or artifacts related to Native Hawaiians will not be accepted into Federal collections without prior approval of the Army National Guard Environmental Program Manager, after consultation with the State/installation Cultural Resources Manager and Coordinator of Native American Affairs. Acceptance of archaeological material may be subject to additional Federal laws and regulations, and the Environmental Program Manager will advise the museum director/curator regarding any specific cultural resources requirements. Such requirements include, but are not limited to, the National Historic Preservation Act (16 U.S.C. 470a-w) and the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001 et seq.).

2.7 Information Restrictions

Section 304 of the NHPA [16 U.S.C. 470w-3(a) — Confidentiality of the location of sensitive historic resources] states that

- (a) The head of a Federal agency or other public official receiving grant assistance pursuant to this Act, after consultation with the Secretary, shall withhold from disclosure to the public, information about the location, character, or ownership of a historic resource if the Secretary and the agency determine that disclosure may —
 - (1) cause a significant invasion of privacy;
 - (2) risk harm to the historic resources; or
 - (3) impede the use of a traditional religious site by practitioners.

On federal property, ARPA also provides provisions for restriction of information on archaeological site locations. NHOs have an interest in restricting this information and are not expected to divulge such location information unless they can be reassured of restrictions for access. Therefore, it is extremely important that persons using this document and other cultural resources reports and maps understand

that access to all archaeological resource descriptions and locations is restricted to the CRM for internal use only. For this reason, no maps delineating the locations of archaeological resources are included in this ICRMP. No maps will be released to the public.

3. Standard Operating Procedures

The SOPs provided in this ICRMP Update have been streamlined for use by HIARNG non-environmental personnel. Accordingly, they provide basic guidance for the most common situations that have the potential to impact cultural resources. The SOPs should be one of several tools distributed to HIARNG personnel to help them identify those actions that can impact cultural resources, demonstrate the consequences of conducting actions without appropriate review by the CRM, and highlight the appropriate process for coordination. Guidance for the CRM is provided throughout this ICRMP Update, particularly in **Appendix J**.

SOPs should be made available to all personnel including any tenants, contractors, and occasional users. Include an overview in the orientation packet for tenants and occasional users, and include appropriate SOPs in contracts. SOPs can also be featured on the facility website. Flow charts and procedures for inadvertent discovery can also be included in Trainers' Guides and Soldiers' Cards.

Cultural Resources Manager. AR 200-1 requires the designation of a CRM to coordinate the virtual installation's cultural resources management program. The CRM is, therefore, responsible for the oversight of activities that might affect cultural resources on HIARNG land or HIARNG activities that might have an effect on cultural resources on non-HIARNG lands. CRMs should be provided with adequate training to ensure that they have a full understanding of their position duties and can provide adequate guidance on compliance with cultural laws and regulations to other stakeholders.

Annual Cultural Resources Training. To enhance integration of cultural resources issues into the planning process and to improve the manner in which cultural resources support the HIARNG mission, the CRM should provide access to awareness training for training site managers, field Commanders and their troops, maintenance staff, and others who may encounter cultural resources. Training subjects can include understanding SOPs, introduction to cultural resources regulations and management, and identification of cultural resources. Training for non-environmental personnel is crucial to ensure a successful cultural resources management program, compliance with environmental laws and policies, and protection of cultural resources.

Timing of SOPs:

SOP	Timing
SOP No. 1: Maintenance and Repair Activities	For exempt actions, no additional time is required. For non-exempt actions, anticipate a minimum of 2 months.
SOP No. 2: Disposal or Demolition of Excess Property	Anticipate a minimum of 6 to 8 months for historic structures.
SOP No. 3: Mission Training of Military and Tenant Personnel	Clearing lands for training requires approximately 4 to 6 months for archaeological surveys. Personnel should be familiar with the contents of SOP 5; can be done as part of annual training and unit in-briefings.
SOP No. 4: Emergency Actions	A minimum of 7 days.
SOP No. 5: Inadvertent Discovery	Personnel should be familiar with the contents of the SOP; can be done as part of annual training and unit in-briefings. Inadvertent discoveries will take a minimum of 30 days.
SOP No 6: Consultation with SHPO and NHOs	Ongoing consultation is required to ensure the success of the HIARNG mission. Typical consultation timeline is 30 days after NHPA Section 106 letter is submitted to the SHPO.

STANDARD OPERATING PROCEDURE NO. 1
for
Maintenance and Repair Activities

Contact: Kristine Barker, Cultural Resources Specialist and Outreach Coordinator, Environmental Division
3949 Diamond Head Road Honolulu, Hawaii, 96816; 808-672-1264; kristine.p.barker.nfg@mail.mil.

Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken prior to maintenance and repair activities on HIARNG properties. It is intended for all personnel other than the Cultural Resources Manager (CRM). Examples of applicable personnel are:

- Leadership - TAG, DAG, HIARNG Commander, CoS
- ENV, FMO
- USPFO
- G-3, Operations
- G-1, G2, G4, and G6.
- Facility managers and armorers
- Personnel assigned to historic facilities

These procedures are intended to ensure that no disturbance or destruction of significant architectural resources (or their character-defining features) and archaeological resources take place.

Affected Site or Training Installation(s): HIARNG virtual installation

Statutory Reference(s) and Guidance:

- National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800)
- Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings
- Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes
- National Park Service Preservation Briefs
- DoD Minimum Antiterrorism Standards for Buildings (Unified Facilities Code [UFC] 04-010-01)
- Programmatic Memorandum of Agreement for the Demolition of World War II Temporary Buildings, 07 June 1986
- Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management

- AR Engineering Technical Letter 1110-3-491 – Sustainable Design for Military Facilities (2001)
- American Disability Act Accessibility Guidelines for Buildings and Facilities as amended in 2002

Applicability:

Typical actions that trigger this SOP:

- Building maintenance and repair (Form 420R, Form 1391, or work order)
- Landscape and grounds replacement
- Clearing and grubbing
- Road clearing and repair
- Trail clearing

Specific events that trigger this SOP:

- Window, roof, and siding repair or replacement
- Interior modifications and/or renovations
- Exterior modifications and/or renovations
- Clearing and vegetation replacement
- Road, trail, and curb repair or replacement

Coordination (see Figure 3-1):

- Consult the CRM to determine if the building, structure, or landscape element affected by proposed maintenance activity or use is either a historic property or has not been evaluated for National Register eligibility.
- The CRM will determine whether the proposed activity has the potential to impact cultural resources. If so, it is the CRM's responsibility to activate the NHPA Section 110/106 process and coordinate with the State Historic Preservation Division (SHPD) or other stakeholders.
- The CRM will advise the Manager of any project modifications, treatment plans, or appropriate treatments that have been defined in consultation with the SHPD and other stakeholders.

When the proposed activity involves ground-disturbing activities, proponents must:

- Check with the CRM to determine if the activity location has been previously surveyed for archaeological resources.
- The CRM will advise on clearances or needed surveys. No ground-disturbing activity may occur until authorized by the CRM.

- Refer to SOP 4 for inadvertent discoveries during ground-disturbing activities.

STANDARD OPERATING PROCEDURE 1
Maintenance and Repair Activities

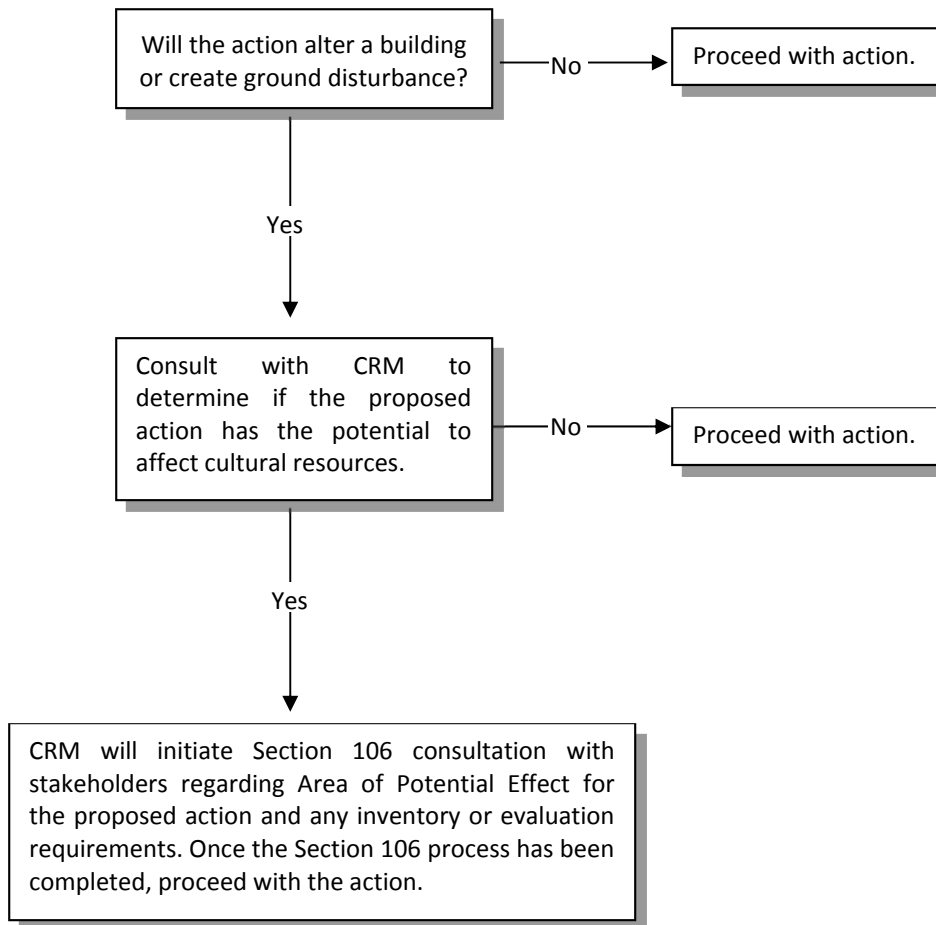


Figure 3-1. Flow Chart for Maintenance and Repair Activities

STANDARD OPERATING PROCEDURE NO. 2

for

Disposal or Demolition of Excess Property

Contact: Kristine Barker, Cultural Resources Specialist and Outreach Coordinator, Environmental Division
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Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken prior to disposal or demolition of federally owned or controlled property that is eligible for listing on the National Register of Historic Places or that needs further evaluation to determine eligibility. It is intended for all personnel. Examples of applicable personnel are:

- Leadership - TAG, DAG, HIARNG Commander, CoS
- ENV, FMO
- USPFO
- G-3, Operations
- G-1, G2, G4, and G6.
- Facility managers and armorers
- Personnel assigned to historic facilities

Affected Site(s) or Training Installation(s): HIARNG virtual installation

Statutory Reference(s) and Guidance:

- National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800)
- Programmatic Memorandum of Agreement for the Demolition of World War II Temporary Buildings, 07 June 1986
- Executive Order 13327 – Federal Real Property Asset Management
- Program Comment: DoD World War II- and Cold War-Era Ammunition Storage Facilities
- Program Comment: DoD Cold War-Era Unaccompanied Personnel Housing

Typical situations: Building or structure demolition or replacement

Typical triggering event: Mission requirement change causing the removal or replacement of historic buildings and structures (see **Figure 3-2**).

Procedures: If mission requirements cause the demolition or excess of a building or structure that is either eligible for listing on the National Register of Historic Places or that has not been evaluated for eligibility, the project proponent should contact the Cultural Resources Manager (CRM) to initiate the

Section 106 process. The CRM will request information on alternatives to the demolition or disposal action such as the potential for using the building for another mission purpose (including potential renovation or rehabilitation) or the potential to relocate or lease the building.

If mission requirements cause the demolition and replacement of historic buildings or structures onsite, the replacement design should be compatible with other buildings in the same area. Changes to the landscape should convey the historic pattern of land use, topography, transportation patterns, and spatial relationships.

An Economic Analysis should be conducted prior to making a decision to demolish or excess a historic building and replace it with new construction. Often, rehabilitation or renovation can be more cost-effective. Consult the CRM for guidance. The CRM will also need to initiate compliance with federal regulations.

Compliance procedures can require a minimum of four to six months to complete.

STANDARD OPERATING PROCEDURE 2 Disposal or Demolition of Excess Property

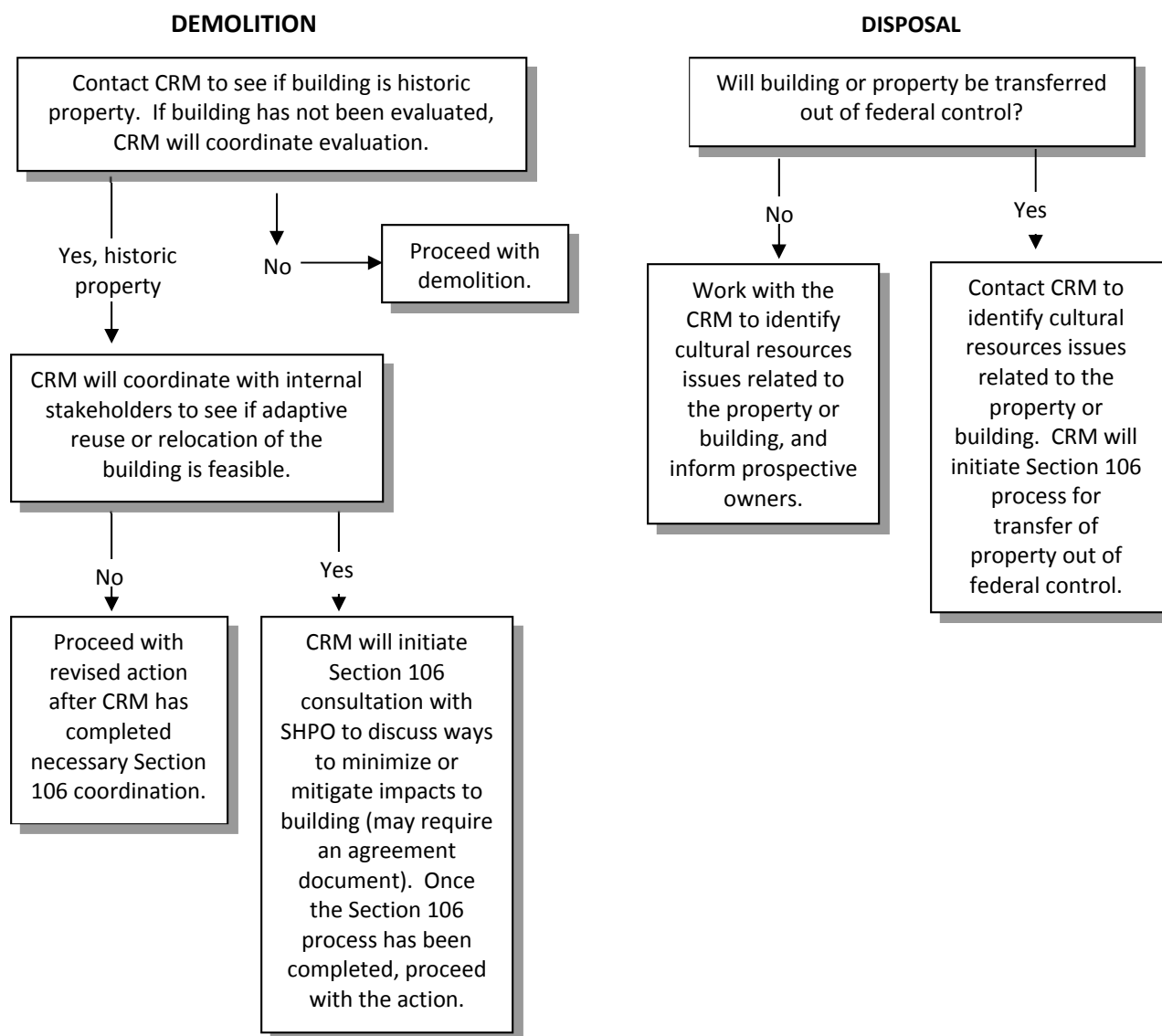


Figure 3-2. Flow Chart for Disposal or Demolition of Excess Property

STANDARD OPERATING PROCEDURE NO. 3
for
Mission Training of Military and Tenant Personnel

Contact: Kristine Barker, Cultural Resources Specialist and Outreach Coordinator, Environmental Division
3949 Diamond Head Road Honolulu, Hawaii, 96816; 808-672-1264; kristine.p.barker.nfg@mail.mil.

Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken prior to conducting mission training exercises on HIARNG and non-HIARNG property. It is intended for all personnel. Examples of applicable personnel are:

- Leadership - TAG, DAG, HIARNG Commander, CoS
- ENV, FMO
- USPFO
- G-3, Operations
- G-1, G2, G4, and G6.
- Facility managers and armorers
- Personnel assigned to historic facilities

Nonmilitary units or tenants using HIARNG lands will also be instructed on responding to inadvertent discovery situations (see SOP No. 5).

Statutory Reference(s):

- Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulations (43 CFR 10)
- Archaeological Resources Protection Act (ARPA)
- National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800)
- National Environmental Policy Act (NEPA)

Applicability:

Typical actions that could trigger these requirements:

- Outside field training exercises on HIARNG and non-HIARNG property

Specific events that could trigger these requirements:

- Planning, scheduling, and implementation of field training exercises

- Expansions of training areas
- Major changes in types and locations of training exercises

Affected Site(s) or Training Installation(s): HIARNG virtual installation

Actions: This section describes specific actions to be taken before and during training to protect cultural resources (see **Figure 3-3**):

- Planning Operations and Training Office (POTO), Reservation Maintenance, Unit Commanders and Environmental Liaison, Environmental Unit Command Officer – planning and scheduling of training
- When planning field training, contact the CRM at least four months in advance for archaeological clearances. If planning will involve expansions at training areas or major changes in types and locations of training exercises, a longer period will be required for review and coordination.
- Check with CRM to determine archaeological sensitivity of training areas. If possible, avoid areas of high sensitivity.
- Coordinate with CRM for archaeological clearances for mission-essential areas.

Range Control: At the initiation of and during training at a HIARNG training installation

- Ensure units using the site(s) or training installation(s) have been provided with proper information on protection of cultural resources including SOP 4 on inadvertent discovery and maps illustrating closed areas prior to conducting mission training
- Monitor compliance with SOPs and closures by units training at the site(s) or training installation(s)
- Report violations of closures and SOPs to the CRM
- Provide feedback to CRM on effectiveness of orientation materials

Unit Commander

- Ensure field troops understand applicable cultural resources policies and SOPs
- Direct questions clarifying cultural resources policies and procedures to the CRM
- Ensure training does not occur in areas that are closed and training restrictions are observed
- Report violations of policies, SOPs, and closures to training installation manager
- Provide feedback to CRM on effectiveness of orientation materials

Field Troops/Tenants

- Review cultural resources information regarding the proposed training area prior to conducting training exercises
- Follow applicable SOPs for the training area
- Comply with all closures of locations within training areas and any restrictions on training activities in locations of resource sensitivity
- Report any discoveries to unit Commander

STANDARD OPERATING PROCEDURE 3 Mission Training of Military and Tenant Personnel

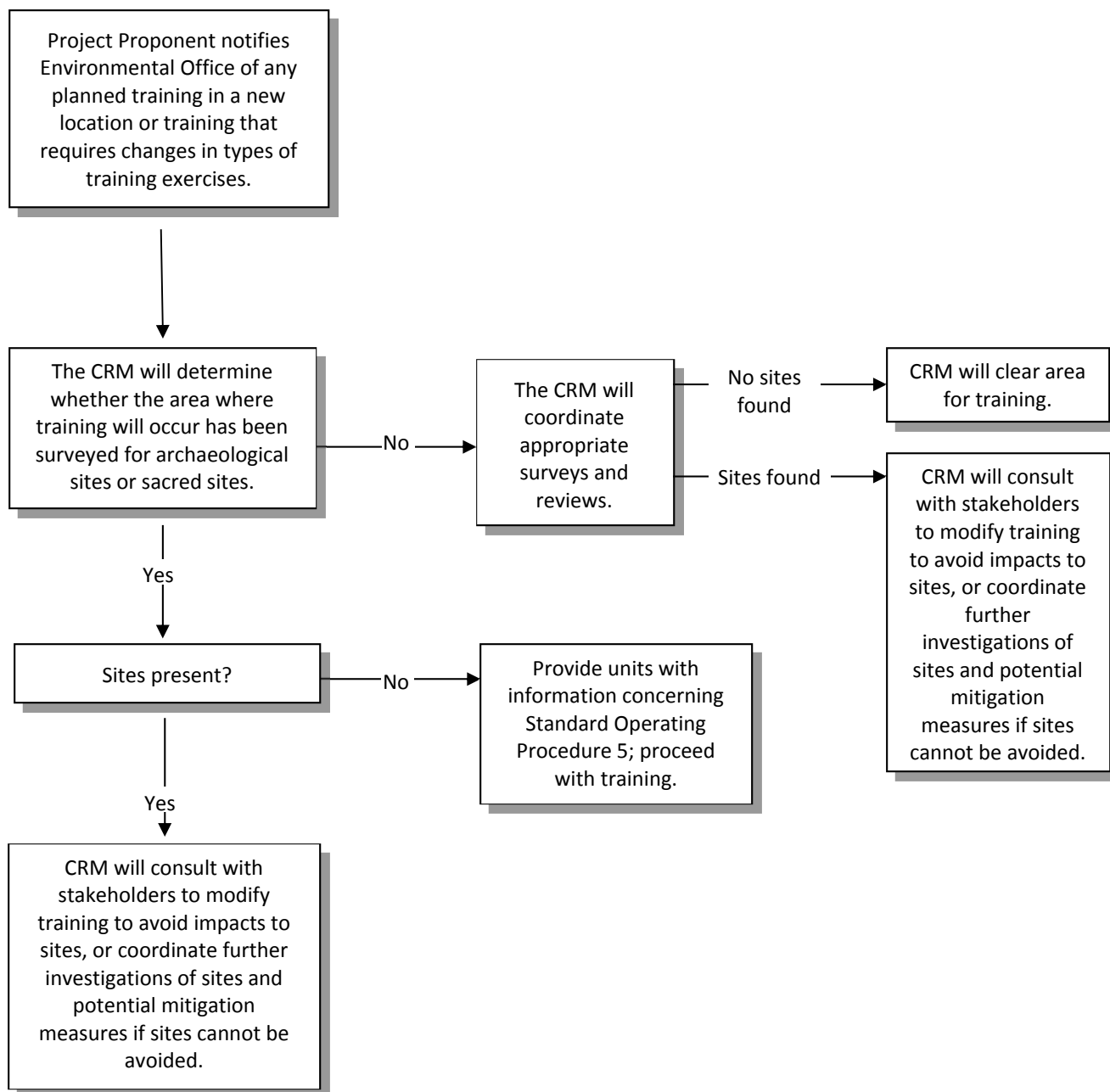


Figure 3-3. Flow Chart for Mission Training of Military and Tenant Personnel

STANDARD OPERATING PROCEDURE NO. 4

for

Emergency Operations

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Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken prior to conducting emergency operations on HIARNG and non-HIARNG property. It is intended for all personnel. Examples of applicable personnel are:

- Leadership - TAG, DAG, HIARNG Commander, CoS
- ENV, FMO
- USPFO
- G-3, Operations
- G-1, G2, G4, and G6.
- Facility managers and armorers
- Personnel assigned to historic facilities

Non-military units or tenants using HIARNG facilities will also be instructed on responding to inadvertent discovery situations (see SOP No. 5).

Policy: Responses to emergencies and all planning for emergency response actions at HIARNG site(s) and training installation(s) will be carried out in accordance with the statutory applications contained in

- Native American Graves Protection and Repatriation Act (NAGPRA), Archaeological Resources Protection Act (ARPA), National Historic Preservation Act (NHPA), and their respective implementing regulations (36 CFR 800; 43 CFR 10) on federal lands
- National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800) for federally supported actions on nonfederal public lands and private lands
- National Environmental Policy Act (NEPA) for federally supported actions that require it

It should be noted that immediate rescue and salvage operations conducted to preserve life or property are exempt from the provisions of Section 106 (36 CFR 800.12[d]). However, once the emergency response action has been completed, the CRM is responsible for completing any further Section 106 coordination to mitigate any impacts to cultural resources resulting from the action.

Procedure (Figure 3-4): All reasonable efforts are made to avoid or minimize disturbance of significant cultural resources during emergency operations. Planners will communicate with applicable CRM regarding potential effects on significant cultural resources that might occur in association with such activities.

Upon notification of a proposed emergency operation, the CRM will notify and consult with the appropriate agencies and parties, regarding the known or likely presence of cultural resources in the area of the proposed operation. The agencies and parties are expected to reply in seven days or less. Notification may be verbal, followed by written communication. This applies only to undertakings that will be implemented within 30 days after the need for disaster relief or emergency action has been formally declared by the appropriate authority. An agency may request an extension of the period of applicability prior to expiration of the 30 days. The CRM will ensure that all HIARNG personnel and units involved in the project are briefed regarding the protocol to be followed in the case of the inadvertent discovery of cultural resources during emergency operations (SOP No. 5).

STANDARD OPERATING PROCEDURE 4 Emergency Operations

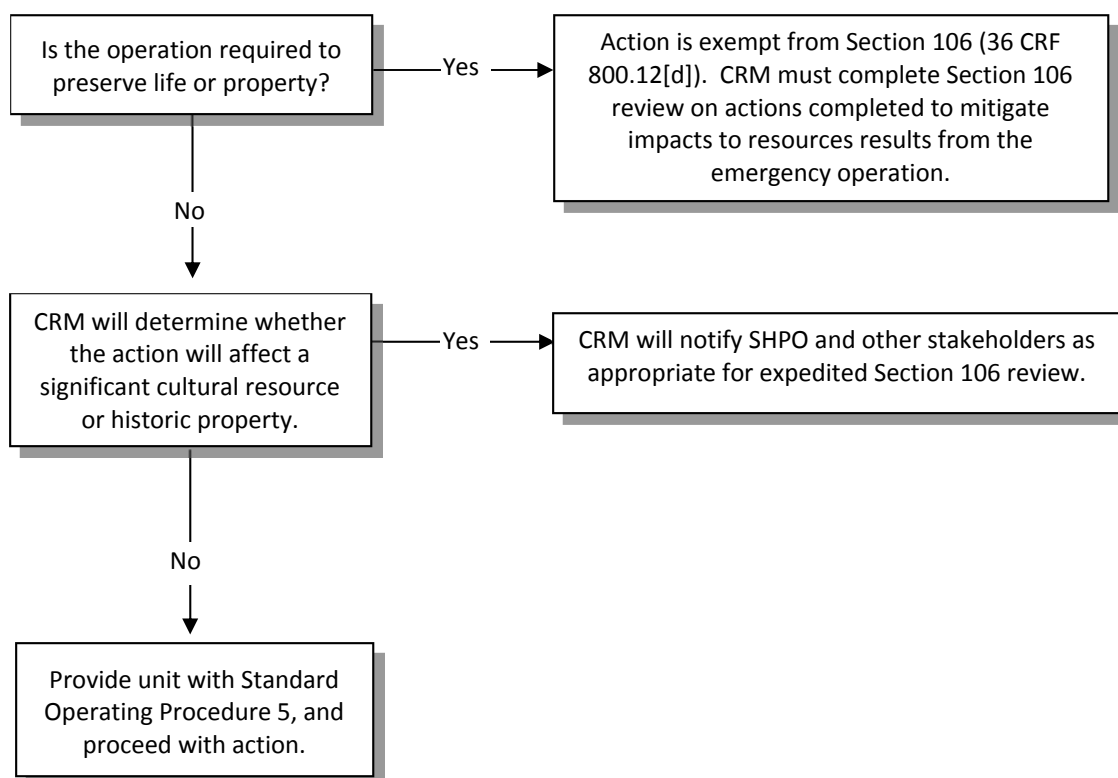


Figure 3-4. Flow Chart for Emergency Operations

STANDARD OPERATING PROCEDURE NO. 5
for
Inadvertent Discovery of Cultural Materials

Contact: Kristine Barker, Cultural Resources Specialist and Outreach Coordinator, Environmental Division
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Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken upon inadvertent discovery of cultural resources. It is intended for all personnel. Examples of applicable personnel are

- Leadership - TAG, DAG, HIARNG Commander, CoS
- ENV, FMO
- USPFO
- G-3, Operations
- G-1, G2, G4, and G6.
- Facility managers and armorers
- Personnel assigned to historic facilities

Statutory Reference(s):

- Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulation (43 CFR 10)
- Archaeological Resources Protection Act (ARPA)
- National Historic Preservation Act (NHPA) and its implementing regulation (36 CFR 800)

Applicability:

Typical actions that trigger this SOP:

- Field training exercises
- Construction and maintenance
- Activities such as digging, bulldozing, clearing or grubbing
- Off-road traffic
- General observations (i.e., eroded areas, gullies, trails)

Discovery of the following will trigger this SOP:

- Discovery of known or likely human remains
- Unmarked graves
- Pre-contact or historical artifacts
- Archaeological features
- Paleontological remains

Actions: This section describes specific actions to be taken for inadvertent discovery. The flowchart is intended to be used by unit/activity level personnel, unit Commanders, and similar personnel, as a decision-making guide when inadvertent discoveries are made as described under the applicability section of this SOP (**Figure 3-5**).

Unit personnel, contractor, field crews, other tenants

- Cease ground-disturbing activity when possible historical artifacts and features, human remains, or burials are observed or encountered
- Report any observations or discoveries of historical artifacts and features, human remains, burials, or features immediately to the unit Commander or facility manager
- Secure the discovery location(s).

Unit Commander or Training Installation Manager

- Immediately notify Range Control.
- Await further instructions from the range control officer.
- Examine the location of the discovery to ensure that it has been properly secured. Take appropriate measures to further secure location if needed.
- Coordinate with range control officer on where activities can resume.
- Give direction to the field troops, construction crew, or non-ARNG user regarding locations where training exercises or activity may continue.

Range Control Officer

- Examine the location of the discovery to ensure that it has been properly secured. Take appropriate measures to further secure location (from vandalism and weather) if needed.
- Give direction to the unit Commander, construction crew, or non-ARNG user regarding locations where training exercises or activity may continue.
- Immediately notify the CRM.

- If human remains are known or suspected to be present, also promptly notify the state police.

Activity may not resume in area of discovery until cleared by the CRM. Anticipate a minimum of 30 days.

Cultural Resources Manager:

The CRM has a number of specific procedures to follow in the event of an inadvertent discovery, with procedures varying dependent on whether the discovery occurs on federal, state, or privately owned land, and whether human remains or funerary items are discovered. Guidance for this topic is included in Appendix J of the Integrated Cultural Resources Management Plan.

STANDARD OPERATING PROCEDURE 5 **Inadvertent Discovery of Potential Cultural Resource**

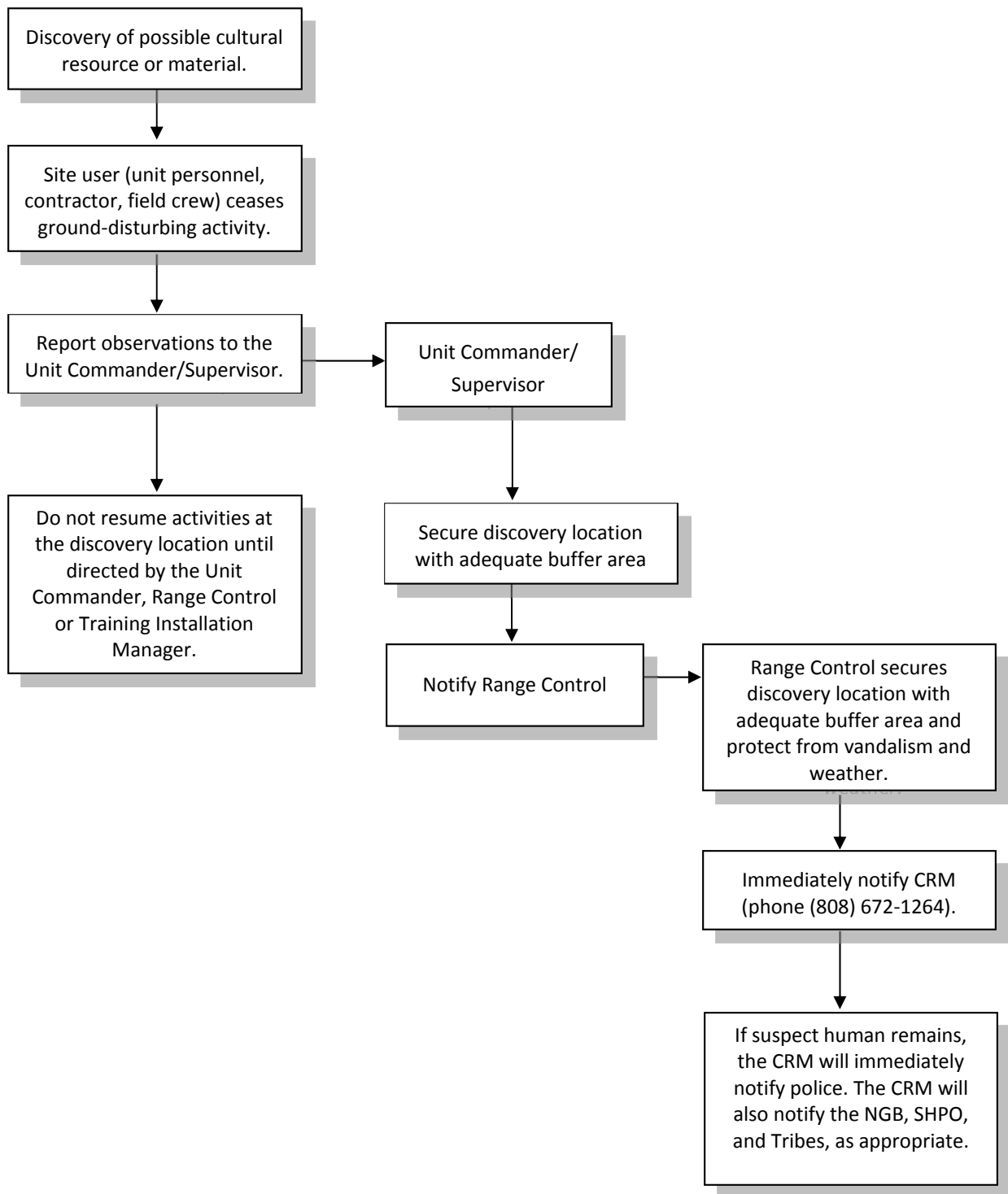


Figure 3-5. Flow Chart for the Inadvertent Discovery of Potential Cultural Resource

STANDARD OPERATING PROCEDURE No. 6
For
Consultation with SHPO and NHOs

Contact: Kristine Barker, Cultural Resources Specialist and Outreach Coordinator, Environmental Division
3949 Diamond Head Road Honolulu, Hawaii, 96816; 808-672-1264; kristine.p.barker.nfg@mail.mil.

Scope: Federal law requires consultation with the SHPD, affected NHOs, Native Hawaiian religious leaders and representatives, lineal descendants of affected NHOs, and the interested public. See **Appendix I** for more information on legal and regulatory standards. Consultation is a dialog between two individuals or groups in which one has expertise, knowledge, or experience that can inform a decision. It must be noted that consultation is not merely notification or the obtaining of consent.

This Standard Operating Procedure (SOP) outlines the steps to be taken when an undertaking or project requires consultation with the SHPO and/or NHOs under Section 106 or HRS Chapter 6E for 100% State Funded undertakings. The CRM is responsible to consult with the SHPO and affected NHOs early in the planning process. It is the Project Managers responsibility to communicate to the CRM when upcoming projects will require consultation for either ground disturbance or impacts to historic building/structures. The CRM will need at a minimum: Project description and justification, project construction drawings (30% or higher), a location map designating the project boundaries, photos of existing conditions, specifications if applicable, digging measurements for all ground disturbance. It is the Project Manager's responsibility to provide the CRM with accurate undertaking information for effective consultation with the Hawaii SHPD and NHOs. Once the Section 106 and/or HRS Chapter 6E letter has been submitted to SHPD, they are provided 30 days to respond to the HIARNG's request for concurrence. If the CRM does not hear back within 30 days, the CRM will submit an MFR to the Project Manager for their records. It is intended for all personnel. Examples of applicable personnel are:

- Leadership - TAG, DAG, HIARNG Commander, CoS
- ENV, FMO
- USPFO
- G-3, Operations
- G-1, G2, G4, and G6.
- Facility managers and armorers
- Personnel assigned to historic facilities

Statutory Applications:

- Department of Defense Instruction 4710.03:DoD Consultation with NHOs
- National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800)

- Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulations (43 CFR 10)
- Archaeological Resources Protection Act (ARPA)
- Army Regulation (AR) 200-1
- Presidential Memorandum for Heads of Executive Departments and Agencies, dated 29 April 1994: Government-To-Government Relations With NHOs
- Department of Defense Instruction 4710.02: DoD Interactions with NHOs
- Hawaii Revised Statutes, Chapter 6E

Affected Sites or Training Installations: HIARNG virtual installation

Typical triggering events: Undertaking involving a historic building or structure, undertaking involving ground disturbing activities, historic preservation and section 106 activities, matters that significantly or uniquely affect NHOs communities or other interested parties, access, use, and protection of ethnographic sites.

Policy

- The HIARNG TAG shall consult with NHOs and other interested parties in the development and implementation of HIARNG cultural resources management plans. The HIARNG TAG may enter into contracts with said groups for the purpose of facilitating consultation obligations and assessment services.
- The HIARNG, in consultation with NHOs and other interested parties, shall establish procedures for consultation.
- The HIARNG shall consult with NHOs and other interested parties in the development of the HIARNG's cultural resource management plans and have the opportunity for input at all phases of plan development, including suggested levels and locations for surveys.

Native Hawaiian Organization Consultation

The HIARNG will designate and recognize specific points of contact for purposes of carrying out any communication and consultation with federally recognized NHOs necessary for implementation of the principles and processes affecting traditional cultural properties; properties of traditional, religious, and cultural importance; sacred sites; human remains; or associated cultural items.

1. The points of contact shall refer matters arising under this SOP to higher HIARNG authority as the occasion or protocol demands.
2. Should the HIARNG point of contact change, the HIARNG will contact the SHPD and all related NHOs regarding the appointment of a new point of contact.
3. The point of contact will review this SOP on an annual basis.

General Consultation Procedures

1. The CRM will work with the National Guard Bureau and the Department of Defense (DoD) Tribal Liaison Office to identify federally recognized Hawaiian Native Organizations with ancestral affiliations to HIARNG lands.
2. The TAG should invite a representative of the NHOs governing body(s) or interested party(s) who may inform decisions from each organization to be a consulting party.
3. Consultation should address potential effects of proposed activities on properties of traditional, religious, or cultural significance to each organization.
4. Terms, conditions, and mitigation determined through consultation may be incorporated into planning and permitting.
5. The NHOs and other interested parties will make good faith efforts to respond within 30 days or less, when feasible, to requests for information, consultation, or concurrence in relation to issues of traditional cultural properties, sacred sites, burials, or human remains.
6. The HIARNG will limit access to site and resource area information to the greatest extent allowed by law.
7. All pertinent interested parties will be included as signatories on all agreement documents for undertakings affecting properties of traditional, religious, and cultural importance; sacred sites; human remains; and associated cultural items.

National Register of Historic Places nominations and eligibility (regarding sacred sites)

1. The only person delegated statutory authority to sign National Register of Historic Places nominations is the Deputy Assistant Secretary of the Army. NHOs and other interested parties do, however, reserve the right, as expressed in the NHPA and sections 60.11 and 60.12 of 36 CFR 60, to concur or not to concur in preparation of recommendations for nomination to the NRHP (in consultation with the HIARNG) when such is related to, or regards, those elements that are traditional cultural properties, sacred sites, or of traditional cultural value to the parties. NHOs and other interested parties have the right of appeal as referenced in 36 CFR 60.
2. The HIARNG and SHPD/ NHOs agree on nominations to the NRHP regarding traditional cultural properties and sacred sites.
3. *EO 13007* expresses, in general, the parameters of sacred sites and general accommodations that must be made for their access, use, and protection.

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Appendices

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Appendices

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APPENDIX A

GLOSSARY

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Glossary

Advisory Council on Historic Preservation (ACHP) – The ACHP was established by Title 11 of the National Historic Preservation Act to advise the president and Congress, to encourage private and public interest in historic preservation, and to comment on federal agency action under Section 106 of the National Historic Preservation Act.

Army Environmental Database – Environmental Quality (AEDB-EQ) – The Army’s system for reporting quarterly submissions of metrics related to the army’s compliance, conservation and pollution prevention programs.

Archaeological Artifacts – An object, a component of an object, a fragment or sherd of an object, that was made or used by humans; a soil, botanical or other sample of archaeological interest.

Archaeological Records – Notes, drawings, photographs, plans, computer databases, reports, and any other audio-visual records related to the archaeological investigation of a site.

Archaeological Resource – Any material of human life or activities that is at least 100 years of age and is of archaeological interest (32 CFR 229.3(a)).

Area of Potential Effect (APE) – The geographical area within which the undertaking may cause changes in the character of or use of historic properties, if any such properties exist. The APE may change according to the regulation under which it is being applied and should be established in coordination with consulting parties.

Categorical Exclusion (CATEX) – Under NEPA, a CX is a category of actions that a Federal agency has determined does not to have a significant effect on the environment, either individually or cumulatively. Every Federal agency has a list of CXs.

Code of Federal Regulations (CFR) – Includes the government-wide regulations that all federal agencies must follow and have the force of law.

Cultural Items – As defined by NAGPRA, human remains and associated funerary objects, unassociated funerary objects (at one time associated with human remains as part of a death rite or ceremony, but no longer in possession or control of the federal agency or museum), sacred objects (ceremonial objects needed by traditional Native Hawaiian religious leaders for practicing traditional Native Hawaiian religions), or objects of cultural patrimony (having ongoing historical, traditional, or cultural importance central to a federally recognized tribe or Native Hawaiian organization, rather than property owned by an individual Native Hawaiian, and which, therefore, cannot be alienated, appropriated, or conveyed by any individual of the tribe or group).

Cultural Landscape – A cultural landscape is a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values. A cultural landscape can be a historic site, historic designed landscape, historic vernacular landscape, or ethnographic landscape (Cultural Resource Management Guidelines, NPS-28).

Cultural Landscape Approach – To serve as an organizing principle for cultural and natural features in the same way that the idea of an ecosystem serves as an organizing principle for different parts of the natural environment.

Cultural Resources – Historic properties as defined by the NHPA; cultural items as defined by NAGPRA; archaeological resources as defined by ARPA; sites and sacred objects to which access is afforded under AIRFA; and collections and associated records as defined in 36 CFR 79.

Cultural Resources Management Program – Activities carried out under the authority of AR 200-1 to comply with federal statutes and regulations pertaining to cultural resources.

Dr. REAL – A real estate database.

Environmental Assessment (EA) – Under NEPA, an EA is prepared when an agency does not know if a proposed Federal action has potentially significant effects on the environment. EAs conclude either with a Finding of No Significant Impact (FNSI) or Notice of Intent (NOI) to prepare an Environmental Impact Statement.

Environmental Compliance Assessment System (ECAS) – Assists the Army in achieving, maintaining, and monitoring environmental compliance with federal, state, and local environmental regulations. ECAS identifies environmental compliance deficiencies and develops corrective actions and cost estimates to address these deficiencies.

Environmental Impact Statement (EIS) – Under NEPA, an EIS is prepared for major Federal actions that could have potentially significant effects on the environment.

G-1 – Office of the Deputy Chief of Staff for Personnel

G-2 – Office of the Deputy Chief of Staff for Intelligence (SOIC)

G-3 – Office of the Deputy Chief of Staff for Operations

G-4 – Office of the Deputy Chief of Staff for Logistics

G-6 – Office of the Deputy Chief of Staff for Signal (DCSIM)

G-8 – Office of the Deputy Chief of Staff for Budgeting Office

Geographical Information System (GIS) – Electronic maps that can provide information regarding identified structures and archaeological sites that are potentially NRHP-eligible, or that have been determined to be NRHP-eligible.

Hawaii Register of Historic Places – The State Historic Preservation Division is the official keeper of the Hawai'i Register of Historic Places. The list formally recognizes districts, sites, structures, buildings, and objects and their significance in Hawai'i's history, architecture, archaeology, engineering, and culture.

Indian Tribe – Any tribe, band, nation, or other organized American Indian group or community of Indians, including any Alaska Native village or corporation as defined in or established by the Alaska Native Claims Settlement Act (43 USC 1601 *et seq.*) that is recognized as eligible for special programs

and services provided by the United States to Indians because of their status as Indians. Such acknowledged or “federally recognized” Indian tribes exist as unique political entities in a government-to-government relationship with the United States. The Bureau of Indian Affairs maintains the listing of federally recognized Indian tribes. NHOs are referred to as such in this ICRMP and not as Indian Tribe or tribes.

Installation – For real property purposes, an installation is a single site or a grouping of two or more sites for inventory reporting. Each State represents a single virtual installation consisting of all sites the State controls except sites designated as training installations. Training installations can be their own installations if they have their own command structure and if NGB-ARI and NGB-ART have jointly agreed that they may be listed as their own ARNG training installation. One or more sites may be assigned to any one installation but each can only be assigned to a single installation. An installation can exist in three possible forms:

- A single site designated as an installation, (e.g., Camp Roberts, CA);
- Several non-contiguous or contiguous sites grouped together as a single ARNG training installation (e.g., Camp Shelby, MS).
- Several contiguous or non-contiguous sites grouped together as a single virtual installation, (e.g., ARNG manages all the sites in a single state as a virtual installation).

Integrated Cultural Resources Management Plan (ICRMP) – A 5-year plan developed and implemented by an installation Commander to provide for the management of cultural resources in a way that maximizes beneficial effects on such resources and minimizes adverse effects and impacts without impeding the mission of the installation and its tenants.

Memorandum of Agreement (MOA) – A formal written agreement containing the results of discussions among the federal agency, the SHPD, and the ACHP, and can include other entities, state agencies, and/or interested public. The MOA documents mutual agreements upon statements of facts, intentions, procedures, and parameters for future actions and matter of coordination. It shows how the needs of the federal agency, the needs and desires of the public and the scientific / historical significance of the property have all been protected. An MOA is not required by law or regulation except to resolve adverse effects issues (see 36 CFR 800.6(c)). In all other circumstances, it is an optional tool that can be used to ensure compliance with NHPA. Typically, an MOA is used to spell out the roles of the signatories in mitigating the effects of an action on a historic property.

National Historic Landmark (NHL) – National Historic Landmarks are buildings, historic districts, structures, sites, and objects that possess exceptional value in commemorating or illustrating the history of the United States. They are so designated by the Secretary of the Interior after identification by National Park Service professionals and evaluation by the National Park System Advisory Board, a committee of scholars and other citizens.

National Park Service – The bureau of the Department of the Interior to which the Secretary of the Interior has delegated the authority and responsibility for administering the National Historic Preservation Program.

National Register Criteria – The criteria established by the Secretary of the Interior for use in evaluating the eligibility of properties for the NRHP (36 CFR 60).

National Register of Historic Places (NRHP) – A nationwide listing of districts, sites, buildings, structures, and objects of national, state, or local significance in American history, architecture, archaeology, or culture that is maintained by the Secretary of the Interior. NRHP listings must meet the criteria found in 36 CFR 60.4.

Native Hawaiian Organization (NHOs) – The NHPA defines an NHOs as “any organization which serves and represents the interests of Native Hawaiians; has a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians. The term includes, but is not limited to, the Office of Hawaiian Affairs of the State of Hawaii and *Hui Malama I Na Kupuna O Hawai'i Nei*, an organization incorporated under the laws of the state of Hawaii.” While NHOs are not federally recognized Indian tribes, they are treated similarly as consulting parties in the Section 106 process. A Native Hawaiian is defined in Section 301 (17) of the NHPA. The NHPA defines an NHO as “any organization which serves and represents the interests of Native Hawaiians; has a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians. The term includes, but is not limited to, the Office of Hawaiian Affairs of the State of Hawaii and *Hui Malama I Na Kupuna O Hawai'i Nei*, an organization incorporated under the laws of the state of Hawaii” (16 U.S.C. 470w).

NAGPRA defines NHOs as any organization which serves and represents the interests of Native Hawaiians, has as a primary and stated purpose the provision of services to Native Hawaiians, and has expertise in Native Hawaiian affairs, and shall include OHA and *Hui Malama I Na Kupuna O Hawai'i Nei*. [25 USC 3001 (11)]

Paleontological Resources – Scientifically significant fossilized remains, specimens, deposits, and other such data from prehistoric, non-human life.

Parcel – a parcel is a contiguous piece or pieces of land described in a single real estate instrument. A parcel can also be described as a specific area of land whose perimeter is delineated by metes and bounds or other survey methods. A parcel represents each individual land acquisition by deed or grant (i.e., each separate real estate transaction). A single real estate transaction may acquire multiple parcels. Each parcel is shown by a single lot record in the Real Property Inventory (RPI). Parcels are, therefore, the building blocks of land for a site. A parcel is created by a real estate transaction whereby a Military Department or the State acquires an interest in land, and a legal instrument evidences the interest so acquired.

Planning Resource for Infrastructure Development and Evaluation (PRIDE) – The PRIDE database is the Planning Resource for Infrastructure Development and Evaluation (PRIDE). It is a centralized database to support the identification of assets within an installation at each state. It provides NGB with real property information from which to manage its real property assets. The PRIDE database includes information about facilities, equipment, and grounds at each installation, and information regarding whether the building has been evaluated for its eligibility to the NRHP and whether it is eligible for or listed on the NRHP. The PRIDE does not contain information regarding archaeological sites at installations.

Predictive Model – Modeling used to determine areas of high, medium, and low archaeological potential.

Programmatic Agreement (PA) – A formal agreement between agencies to modify and/or replace the Section 106 process for numerous undertakings in a program. A PA will outline modified Section 106 procedures that streamline an agency’s regulatory obligations.

Real Property Development Plans (RPDP) – A written resource prepared by the State ARNG, to be consulted and used during the preparation of an ICRMP, specifically in dealing with existing and planned structures at a virtual installation.

Record of Environmental Consideration (REC) – A document that is used to explain how an action is covered in a CX.

Section 106 – Under the NHPA, Section 106 provides direction for federal agencies regarding undertakings that affect properties listed or those eligible for listing on the NRHP, and is implemented by regulations (36 CFR 800), issued by the ACHP.

Section 110 – Under the NHPA, Section 110 outlines agencies’ responsibilities with respect to historic properties and requires federal agencies to locate, inventory, and nominate all properties that may qualify for the NRHP.

Section 111 – Under the NHPA, Section 111 addresses leases and exchanges of historic properties. It allows the proceeds of any lease to be retained by the agency for use in defraying the costs of administration, maintenance, repair, and related expenses of historic properties.

Site – in the broadest terms a site is a geographic location. In more focused terms, a site is a specific area of land consisting of a single parcel or several contiguous parcels. Each site must be able to produce a closed cadastral survey. A site can be any physical location that is or was owned by, leased to, or otherwise possessed by one Military Service or State (for National Guard purposes), to include locations under the jurisdiction of the Army National Guard (ARNG) where a hazardous substance has been deposited, stored, disposed of, placed, or otherwise came to be located. Do not combine Federal parcels with state parcels in a single site, even if contiguous. There will be no sites that contain both Federal and state owned property; create separate sites. A site may exist in one of three forms:

- Land only, where there are no facilities present and where the land consists of either a single parcel or two or more contiguous parcels.
- Facility or facilities only, where the underlying land is neither owned nor controlled by the Federal or State government. A stand-alone facility can be a site. If a facility is not a stand-alone facility, it must be assigned to a site.
- Land and all the facilities thereon, where the land consists of either a single parcel or two or more contiguous parcels.

Example of rule applied - a state or municipal owned road that traverses an area. The rule defines such an area as a single site if the military retains controls or ownership of the land under the road. However, if the road and the right-of-way along the road are owned by a party other than the Military Department, than this would be two sites since contiguous ownership does not exist.

Site Locational Models – A model, through past examples, used to predict locations of archaeological sites.

State Historic Preservation Officer (SHPO) – The person who has been designated in each state to administer the State Historic Preservation Program, including identifying and nominating eligible properties to the NRHP and otherwise administering applications for listing historic properties in the NRHP. The SHPO in Hawaii is the Administrator of the State Historic Preservation Division (SHPD) and referred to as such in this ICRMP. SHPO is used as a general reference in this ICRMP.

Survey – A scientific sampling of the extent and nature of archaeological resources within a specific area.

Training Installation – Refers to one of the 45 training installations operated by the ARNG (see list in Handbook).

Tribes – is used throughout this ICRMP to include American Indian tribes and organizations and Alaska Natives and organizations as defined in the NHPA and NAGPRA. NHOs are referred to as such and not as tribes in this ICRMP.

Undertaking – “An undertaking is a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; those requiring a federal permit, license, or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a federal agency” (36 CFR 800.16[y]).

Virtual Installation – (Standard definitions according to DoDI 4165.14). A virtual installation refers to all holdings of a HIARNG within the boundaries of Hawaii.

APPENDIX B

NATIONAL ENVIRONMENTAL POLICY ACT REVIEW AND CORRESPONDENCE

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LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

Environmental Office

Mr. Patrick Leonard, Field Supervisor
United States Fish and Wildlife Service
300 Ala Moana Boulevard, Suite 3122
P. O. Box 50088
Honolulu, Hawaii 96850

Dear Mr. Leonard:

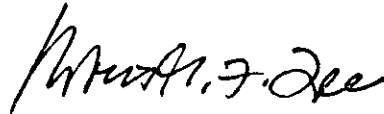
Subject: Endangered Species Act, Section 7 Interagency
Consultation: 2006-2010 Draft Integrated Cultural
Resources Management Plan (ICRMP) and Draft
Environmental Assessment (EA) for All
Installations of the Hawaii Army National Guard
(HIARNG)

Enclosed is a CD-ROM copy of the 2006-2010 Draft ICRMP, with appendices, and a hard copy of the accompanying Draft EA for your review. The ICRMP is a five-year management plan required under Army Regulation 200-4, developed to manage the archaeological and historical sites on HIARNG properties.

As required by the Endangered Species Act, Section 7, the HIARNG is requesting interagency consultation regarding the potential impacts of implementing the ICRMP. The plan is summarized in Chapter 2 of the EA and described in detail in Chapter 2.2 of the ICRMP. Resource descriptions and anticipated consequences are covered in Chapters 4 and 5 of the EA, Endangered Species specifically in Chapter 4.5.4. We request that your organization review our findings and conclusions and concur or comment in a letter to the HIARNG by January 31, 2006. Please address comments on the EA and the ICRMP (if any) separately.

If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Karl Buermeyer, NEPA Administrator, at (808) 733-4359.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert G. F. Lee". The signature is written in a cursive, slightly slanted style.

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

Environmental Office

Ms. Sunny Greer, Director
Cultural Programs
State Historic Preservation Division
601 Kamokila Blvd., Suite 555
Kapolei, Hawaii 96707

Dear Ms. Greer:

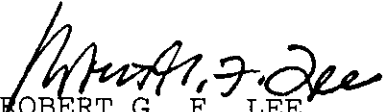
Subject: National Historic Preservation Act (NHPA), Section
106 Consultation: 2006-2010 Draft Integrated
Cultural Resources Management Plan (ICRMP) and
Draft Environmental Assessment (EA) for All
Installations of the Hawaii Army National Guard
(HIARNG)

Enclosed are two CD-ROM copies of the 2006-2010 Draft ICRMP, with appendices, and the accompanying Draft EA for your review. Section 106 of the NHPA of 1966 requires Federal agencies to take into account the effects of their undertakings on historic properties and to consult with our State's Historic Preservation Department to determine if there are any adverse affects in proceeding with implementing the plan. The HIARNG seeks concurrence from your office to commence this five-year management plan, a plan required under Army Regulation 200-4 to manage the archaeological and historical sites on HIARNG properties.

We request that your organization review the enclosed documents and concur or comment on them in writing to the HIARNG by January 31, 2006.

If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,


ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

Environmental Office

Ms. Haunani Apoliona, Chairperson
Office of Hawaiian Affairs
711 Kapi'olani Boulevard, Suite 500
Honolulu, Hawaii 96813

Dear Ms. Apoliona:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) for All Installations of
the Hawaii Army National Guard (HIARNG)

Enclosed is a CD-ROM copy of the 2006-2010 Draft ICRMP, with appendices, for your review and comments. The ICRMP is a five-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments by January 31, 2006. If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosure

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

Environmental Office

Mr. Micah Kane, Chairman
Department of Hawaiian Home Lands
1099 Alakea Street, Suite 2000
Honolulu, Hawaii 96813-4512

Dear Mr. Kane:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) for All Installations of
the Hawaii Army National Guard (HIARNG)

Enclosed is a CD-ROM copy of the 2006-2010 Draft ICRMP, with
appendices, for your review and comments. The ICRMP is a five-
year management plan required under Army Regulation 200-4. The
plan is developed to manage the archaeological and historical
sites on HIARNG properties.

We request that your organization send to the HIARNG, in
writing, any comments by January 31, 2006. If there are any
questions, please contact Mr. Dean Norwood, Interim Environmental
Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon,
Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosure

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

Environmental Office

Ms. Nalani Kahoano Gersaba, President
O'ahu Council
Association of Hawaiian Civic Clubs
P. O. Box 37549
Honolulu, Hawaii 96837

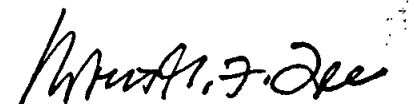
Dear Ms. Gersaba:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) for All Installations of
the Hawaii Army National Guard (HIARNG)

Enclosed are two CD-ROM copies and two hard copies of the 2006-2010 Draft ICRMP, with appendices, for your review and comments. The ICRMP is a five-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments by January 31, 2006. If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,


ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures .

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Appendix C:

Public Involvement

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LIST OF PERSONS WHO MAILED IN COMMENTS TO ICRMP &/OR EA

1. Department of the Air Force, Pacific Air Forces

Mr. Ronnie D. Lanier
Chief, Environmental Flight
15 CES/CEV
75 H Street
Hickam AFB, HI 96853-5233

Valerie Curtis

***7 comments**, only on ICRMP.

2. County of Kaua'i
Planning Department
4444 Rice Street, Suite A473
Lihu'e, HI 96766-1326

Rick Tsuchiya

***3 comments**, only on ICRMP; with request for extension and attendance at 6/01/06 meeting.

3. County of Hawai'i
Planning Department
101 Pauahi Street, Suite 3
Hilo, HI 96720-3043

Christopher J. Yuen, Planning Director

***6 comments**, only on ICRMP.

4. State of Hawai'i
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, HI 96813

Genevieve Salmonson

***2 Comments**, only on EA.

Total Comments: 18; 16 for ICRMP and 2 for EA.

LIST OF PERSONS WHO CALLED REQUESTING COPIES OF ICRMP & EA

<u>Date</u>	<u>Name & Address</u>	<u>When Mailed or Comment Info.</u>
1. 4/10/06	William Aila 86-630 Lualualei Homestead Road Waianae, HI 96792 Ph. 330-0376	4/13/06 (w/Delivery confirmation)
2. 4/13/06	Dr. William W. Steiner Dean, University of Hawaii at Hilo College of Agriculture, Forestry, and Natural Resource Management 200 West Kawili Street Hilo, HI 96720 Email: steiner@hawaii.edu	4/25/06 (w/Delivery confirmation) (4/24 a "5-4-9" day—no one in Pub.) EA & App. "C" emailed on 4/21/06
✓3. 4/19/06	Valerie Curtis	Phoned in comments regarding Bellows RTI section of ICRMP. Monica asked if she could mail in her comments addressed to the TAG.
✓4. 4/27/06	Shanlee Jimenez, County of Kauai Planning Commission	Phoned in to let us know that the Kaua'i Historic Preservation Review Commission has the Draft ICRMP & EA on their meeting agenda for Thurs., 5/4/06.
5. 4/27/06	Cruz Vina, Pearl City Neighborhood Board, Ph. 456-3480, email: vinajrc001@hawaii.rr.com	Requested me or Dean to attend their committee meeting (9 member w/2 vacancies) on Tues., 5/16/06 (7pm, Highlands Int. School) to explain the documents to them.

Public Notice printed in primary newspapers for all facilities:

PUBLIC NOTICE

The Hawaii Army National Guard (HIARNG) invites the public to review its Draft Integrated Cultural Resources Management Plan (ICRMP) and the accompanying Draft Environmental Assessment (EA) for its facilities on Hawai'i, Kaua'i, Maui, Moloka'i, and O'ahu.

The National Historic Preservation Act of 1966, as amended in 2000, requires the HIARNG to prepare an ICRMP to address cultural resource management in conjunction with military training requirements. The National Environmental Policy Act of 1972 (NEPA) requires that the environmental consequences of implementing the ICRMP be assessed, and that organizations, agencies, groups and individuals be consulted and afforded the opportunity to review and comment on the content of the ICRMP and the EA.

Those interested in reviewing these documents may do so by obtaining a copy from the HIARNG Environmental Office at 808-733-4359, or by reviewing a copy at the following Public Libraries: Hawai'i State Library, Kane'ohe, Pearl City, Kaimuki, Lihu'e, Moloka'i, Kahului, Hilo, and Kailua-Kona. Public comments must be received no later than May 8, 2006, and may be sent to: Hawaii Army National Guard, Environmental Office, ATTN: NEPA Administrator, 3949 Diamond Head Rd, Honolulu, HI, 96816.

Statewide Notices

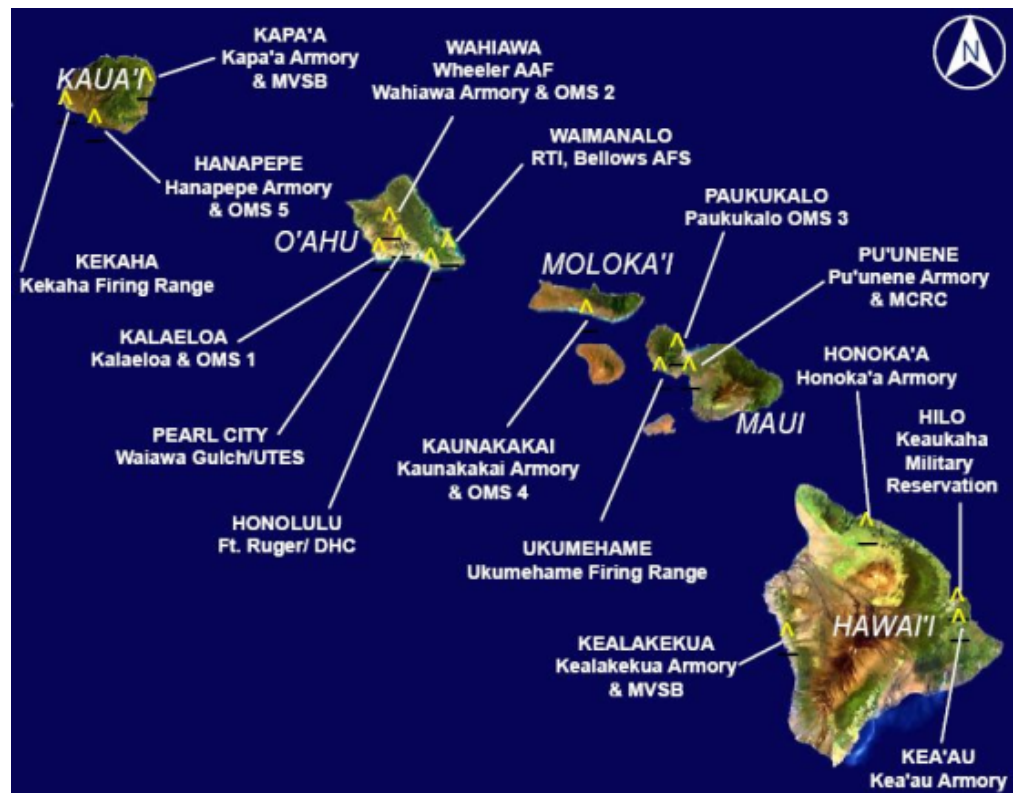
APRIL 8, 2006

Hawai'i Army National Guard Integrated Cultural Resources Management Plan (HRS 343 DEA) Joint NEPA

District: Hawai'i, Kaua'i, Maui, Moloka'i & O'ahu
TMK: Statewide
Proposing Agency: Hawai'i Army National Guard
 3949 Diamond Head Rd., Honolulu, HI 96816
 Contact Karl Buermeyer (733-4359)
Determination Agency: Same as above.
Public Comment Deadline: May 8, 2006
Status: Draft environmental assessment (DEA) notice pending 30-day public comment. Address comments to the proposing agency with copies to the consultant and OEQC.
Permits Required: Section 106 of the National Historic Preservation Act of 1966, NEPA, Chapter 6E, HRS.

The Hawai'i Army National Guard's Integrated Cultural Resources Management Plan (ICRMP) is a five-year plan that presents management protocols and formalizes standard operating procedures (SOPs) for the fiscal years 2006-2010 (FY06 through FY10), and is required by Army Regulation 200-4 (AR 200-4) *Cultural Resources* and Department of Defense Instruction 4751.3 (DoDI 4751.3). These protocols and SOPs support the training mission by assuring compliance with State and Federal cultural resources and historic sites regulations for properties under the control of the Hawai'i Army National Guard (HIARNG). These resources include archaeological sites, Native Hawaiian Traditional Cultural Properties (TCPs) and sacred sites, objects of cultural and historical significance, and structures of historical and architectural significance. This ICRMP offers facility specific protocols to identify, evaluate, preserve, maintain, and protect the HIARNG's cultural resources and historic properties. It identifies research and data col-

lection needs, and offers strategies based on these needs. It provides methods for tracking and monitoring the conditions of the installation's resources over a five-year period. The ICRMP assures compliance by establishing a framework for consultation between the HIARNG, the National Guard Bureau (NGB), the Native Hawaiian community, the Office of Hawaiian Affairs (OHA), the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), other branches of the Department of Defense (DoD), and the public. The ICRMP integrates cultural resources management with current mission activities. The ICRMP is the commander's decision document for cultural resources compliance and management and identifies potential conflicts between the installation's mission and protection of its resources, and documents how those conflicts may be resolved to maintain the use of land for mission purposes. To obtain copies of the ICRMP and EA, please contact Karl Buermeyer, NEPA Administrator of the HIARNG Environmental Office, at 3949 Diamond Head Road, Honolulu, Hawai'i, 96816-4495. The phone number is 733-4359. The document is also available at the regional public libraries on the islands of Hawai'i, Kaua'i, Maui, Moloka'i, and O'ahu.



Multiple Locations statewide

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

MAR 22 2006

Ms. Genevieve Salmonson, Director
Office of Environmental Quality Control
235 South Beretania Street
Leiopapa A Kamehameha, Suite 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: Draft Environmental Assessment (EA) for the 2006-2010 Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are two copies each of the 2006-2010 Draft ICRMP and Draft EA, and a completed OEQC Publication Form. Also enclosed is a CD ROM with .pdf versions of the ICRMP and EA and a project summary. The ICRMP is a 5-year management plan required under Army Regulation 200-4, developed to manage the archaeological and historical sites on HIARNG properties.

As required by HRS Chapter 343, we would like to publish the notice of availability of the draft EA in the April 8 issue of the Environmental Notice.

If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Mr. Karl Buermeyer, NEPA Administrator, at (808) 733-4359.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Lee".

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186
E-mail: oeqc@health.state.hi.us

May 8, 2006

Major General Robert G. F. Lee, Adjutant General
Karl Buermeyer
State of Hawai'i, Department of Defense
Hawai'i Army National Guard
3949 Diamond Head Road
Honolulu, Hawai'i 96816

Dear General Lee and Mr. Buermeyer:

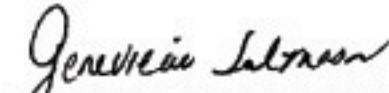
Having reviewed the draft environmental assessment for the Hawai'i Army National Guard Integrated Cultural Resources Management Plan (Joint 343-NEPA) Statewide, the Office of Environmental Quality Control offers the following comments for your review and response.

1. ***Draft Integrated Cultural Resources Management Plan:*** The Draft Integrated Cultural Resources Management Plan (plan) was submitted as a separate document from the draft environmental assessment. Because the description of the environmental setting for each of the seventeen facilities is contained in the plan, the draft environmental assessment needs to indicate that the plan is an "integral part of the draft environmental assessment." We would respectfully recommend that this be accomplished by the placement of language to that effect in the Executive Summary of the draft environmental assessment, and in Section 1.3 (Scope of the Document) on page 3 of the draft environmental assessment.
2. ***Early Consultation Under Section 11-200-9(a)(1), Hawaii Administrative Rules:*** Section 11-200-9(a)(1), Hawai'i Administrative Rules requires the proposing agency to require the applicant to seek the advice and input of the *lead county agency responsible for implementing the county's general plan in which the proposed action is to occur*, and to consult with other agencies

having jurisdiction or expertise as well as citizen groups and individuals which the approving agencies reasonably believes to be affected. Section 11-200-10 (3) notes that the environmental assessment must identify agencies, citizen groups, and individuals consulted. Please ensure that the various planning agencies of the four county governments in the State have been notified of the proposed plan.

Thank you for the opportunity to comment. If there are any questions, please contact Mr. Leslie Segundo, Environmental Health Specialist, at (808) 586-4185.

Sincerely,

A handwritten signature in cursive script, reading "Genevieve Salmonson".

GENEVIEVE SALMONSON
Director

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

Environmental Office

24 April 2006

Dr. William W. Steiner
Dean, University of Hawaii at Hilo
College of Agriculture, Forestry, and Natural Resource
Management
200 West Kawili Street
Hilo, Hawaii'i 96720

Dear Dr. Steiner:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed is a cd-rom of the 2006-2010 Draft ICRMP and of the
Draft Environmental Assessment (EA), as you requested. The ICRMP
is a five-year management plan required under Army Regulation
200-4. The plan is developed to manage the archaeological and
historical sites on HIARNG properties.

We request that any comments you have pertaining to these
documents be received by our office no later than May 8, 2006.
If you have any questions, please contact me at 368-4490, or
Ms. Monica Bacon, Historical Research Associate, at 733-4360.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dean Norwood".

Dean Norwood
Environmental Protection Specialist
Hawaii Army National Guard

Enclosure

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

Environmental Office

13 April 2006

Mr. William Aila
86-630 Lualualei Homestead Road
Waianae, Hawai'i 96792

Dear Mr. Aila:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and of the Draft Environmental Assessment (EA), as you requested. The ICRMP is a five-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that any comments you have pertaining to these documents be received by our office no later than May 8, 2006. If you have any questions, please contact me at 368-4490, or Ms. Monica Bacon, Historical Research Associate, at 733-4360.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dean Norwood".

Dean Norwood
Environmental Protection Specialist
Hawaii Army National Guard

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

Environmental Office

APR 12 2006

Mr. Micah A. Kane, Chairman
Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, Hawaii'i 96805

Dear Mr. Kane:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed are copies of the 2006-2010 Draft ICRMP and the
Draft EA, along with a CD-ROM containing both documents, for your
review and comments. The ICRMP is a 5-year management plan
required under Army Regulation 200-4. The plan is developed to
manage the archaeological and historical sites on HIARNG
properties.

We received the three recommendations that your office
submitted on January 19, 2006, in response to our December 8,
2005, to January 31, 2006, review period for Native Hawaiian
Organizations, and those comments are addressed in the Draft
ICRMP. We request that your organization send to the HIARNG, in
writing, any comments for this current version by May 8, 2006. If
there are any questions, please contact Mr. Dean Norwood,
Environmental Protection Specialist, at (808) 368-4490, or Ms.
Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert G. F. Lee".

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR
STATE OF HAWAII



MICAH A. KANE
CHAIRMAN
HAWAIIAN HOMES COMMISSION

BEN HENDERSON
DEPUTY TO THE CHAIRMAN

KAULANA H. PARK
EXECUTIVE ASSISTANT

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

P.O. BOX 1879
HONOLULU, HAWAII 96805

January 19, 2006

Major General Robert G.F. Lee
Hawaii National Guard
3949 Diamond Head Road
Honolulu, Hawaii 96816

Dear General Lee:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) for All Installations of the
Hawaii Army National Guard (HIARNG)

Thank you for allowing the Department of Hawaiian Home Lands (DHHL) to review and comment of your 2006-2010 Draft ICRMP. This plan for the management of archaeological and historical sites on HIARNG properties is a welcome step towards ensuring the protection and preservation of the Hawaiian culture and historical Hawaiian sites.

DHHL has reviewed your plan and respectfully submits three recommendations.

- We realize that Table 4, on page 43, summarizes a list of Native Hawaiian Organizations (NHO) that served as consultees in the development of the ICRMP, and also qualify as NHO as defined by NAGPRA. However, perhaps a listing of all NAGPRA-qualified NHO as an appendix would prove to be useful to your staff when implementing a particular Standard Operating Procedure (SOP) in a particular island or district. For example, should inadvertent burials be discovered in Bellows Air Force Station, Ko'olaupoko, O'ahu, contact information on NHOs in Ko'olaupoko, as well as contact information for the local Civic Clubs, Hawaiian Homestead Association(s), and the appropriate district representative of the O'ahu Island Burial

. Major General Robert G.F. Lee

January 19, 2006

Page 2

Council, would prove beneficial to your staff in facilitating the consultation process. Also, the copy on Page 42 incorrectly refers to the NHO listing as Table 3.

- SOP #6 Procedures where Human Remains are Involved. Though rare, a separate SOP for "Intentional Excavations" of human remains should be developed, as stipulated in NAGPRA.
- SOP #5, Inadvertent Discovery of Cultural Resources, Procedure 2, makes reference to a "Notification Flowchart on Page 37 in Chapter 7." This reference should read "Notification Process on Page 48 in Chapter 7."

Should you have any questions or concerns, please feel free to contact Kamana'o Mills at Ph. 586-3822

Aloha and mahalo,

A handwritten signature in black ink, appearing to read 'Micah', with a long horizontal stroke extending to the right.

Micah A. Kane, Chairman
Department of Hawaiian Home Lands

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Ms. Haunani Apoliona, Chairperson
Office of Hawaiian Affairs
711 Kapi'olani Boulevard, Suite 500
Honolulu, Hawai'i 96813

Dear Ms. Apoliona:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed are copies of the 2006-2010 Draft ICRMP and the
Draft EA, along with a CD-ROM containing both documents, for your
review and comments. The ICRMP is a 5-year management plan
required under Army Regulation 200-4. The plan is developed to
manage the archaeological and historical sites on HIARNG
properties.

We received the recommendation that your office submitted on
March 20, 2006, in response to our December 8, 2005, to
January 31, 2006, review period for Native Hawaiian
Organizations, and your concern is addressed in the Draft ICRMP.
We request that your organization send to the HIARNG, in writing,
any comments for this current version by May 8, 2006. If there
are any questions, please contact Mr. Dean Norwood, Environmental
Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon,
Historical Research Associate, at (808) 733-4360.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Lee".

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

HRD06/2161

March 20, 2006

Robert G. F. Lee
Major General
Hawaii National Guard
Adjutant General
State of Hawaii Department of Defense
Office of the Adjutant General
3949 Diamond Head Road
Honolulu, HI 96816-4495

RE: Request for review and comment of the 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

Dear Major General Robert G. F. Lee,

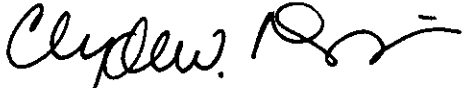
The Office of Hawaiian Affairs (OHA) is in receipt of your December 6, 2006, request for comments on the above-proposed project, which is a five-year management plan required under Army Regulation 200-4, developed to manage the archeological and historical sites of HIARNG. OHA apologizes for the delayed response and offers the following comments.

OHA reminds HIARNG that per the Native American Graves Protection and Repatriation Act, if any Native Hawaiian iwi kūpuna are found, the Office of Hawaiian Affairs is to be notified. We would further appreciate continued consultation with lineal and cultural descendents of potentially affected areas to assure that any cultural impacts are limited or mitigated, if not abolished. We will rely on HIARNG's assurances that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during project activities, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

Major General Robert G. F. Lee
March 20, 2006
Page 2

Thank you for the opportunity to comment. We look forward to reviewing the public draft for review and the final ICRMP, as well as the forthcoming annual updates. If you have further questions, please contact Heidi Guth at (808) 594-1962 or e-mail her at heidig@oha.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Clyde W. Nāmu'o", with a stylized flourish extending from the end.

Clyde W. Nāmu'o
Administrator

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Ms. June N. Cleghorn, Manager
Marine Corp Base Hawai'i, EC & PD
Cultural Resources Program
Building 1360
MCBH Kane'ohe Bay, Hawai'i 96863

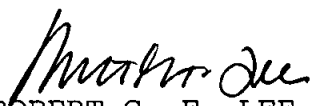
Dear Ms. Cleghorn:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,


ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Jeffrey N. Dodge, Planner
NAVFAC Pacific
258 Makalapa Drive, Suite 100
Honolulu, Hawai'i 96860

Dear Mr. Dodge:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

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Sincerely,

A handwritten signature in dark ink, appearing to read "Robert G. F. Lee".

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Dr. Laurie J. Lucking, Manager
DPW, Environmental Division
Cultural Resources Program
947 Wright Avenue
Schofield Barracks, Hawai'i 96857

Dear Dr. Lucking:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

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Sincerely,

A handwritten signature in black ink, appearing to read "Robert G. Lee".

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Gary O'Donnell, Chief
Hickam Air Force Base
Environmental Planning
15 CES/CEVP, 75 H. Street
Hickam AFB, Hawai'i 96853

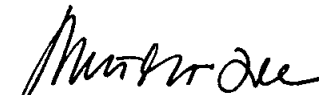
Dear Mr. O'Donnell:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

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Sincerely,


ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures



**DEPARTMENT OF THE AIR FORCE
PACIFIC AIR FORCES**

0 8 MAY 2006

Mr. Ronnie D. Lanier
Chief, Environmental Flight
15 CES/CEV
75 H Street
Hickam AFB HI 96853-5233

Major General Robert G. F. Lee
Hawaii National Guard
Office of the Adjutant General
3949 Diamond Head Road
Honolulu Hawaii 96816-4495

Dear General Lee

Thank you for the opportunity to review and comment on the 2006-2010 Draft Integrated Cultural Resource Management Plan (ICRMP) and Draft Environmental Assessment (EA) for all installations of the Hawaii Army National Guard (HIARNG). Attached are our comments and suggestions regarding the ICRMP. We have no comments for the EA.

If you have any questions or want further information regarding our comments and suggestions, please feel free to call our Contract Inter-Agency Specialist, Ms. Valerie Curtis at 449-1584 ext 251 or via e-mail at valerie.curtis@hickam.af.mil.

Sincerely


RONNIE D. LANIER

Attachment:
PACAF Form 225

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Wilson Kekoa Ho, Chairperson
Waimanalo Neighborhood Board
41-696 Kamehameha Highway
Waimanalo, Hawai'i 96795

Dear Mr. Ho:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

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Sincerely,

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ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Ben Acohido, Chairperson
Wahiawa Neighborhood Board
1729 California Avenue
Wahiawa, Hawai'i 96786

Dear Mr. Acohido:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

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Sincerely,

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Albert Fukushima, Chairperson
Pearl City Neighborhood Board
1841 Palamoi Street
Pearl City, Hawai'i 96782

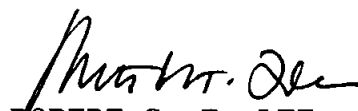
Dear Mr. Fukushima:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
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Hawaii Army National Guard (HIARNG)

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Sincerely,


ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Ms. Maeda Timson, Chairperson
Makakilo/Kapolei/Honokai Hale Neighborhood Board
92-684 Nohona Street
Kapolei, Hawai'i 96707

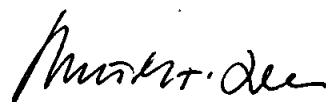
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Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
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Sincerely,


ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Ms. Kiersten Faulkner, Executive Director
Historic Hawai'i Foundation
680 Iwilei Road
Dole Office Building Tower, Suite 690
Honolulu, Hawai'i 96817

Dear Ms. Faulkner:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

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Sincerely,

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Ralston H. Nagata, Administrator
Department of Land and Natural Resources
Division of State Parks
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Nagata:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

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Sincerely,

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ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
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ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Samuel Kalalau III, Chairperson
County of Maui, Department of Planning
Maui County Cultural Resources Commission
200 South High Street, 7th Floor
Wailuku, Hawai'i 96793

Dear Mr. Kalalau:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

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Sincerely,

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Randy Wichman, Commissioner
County of Kau'ai, Department of Planning
Historic Preservation Review Commission
4444 Rice Street
Lihu'e, Hawai'i 96766

Dear Mr. Wichman:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

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Sincerely,

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

COUNTY OF KAUAI
PLANNING DEPARTMENT
4444 RICE STREET, SUITE A473
LIHUE, KAUAI, HAWAII 96766-1326

MEMORANDUM

DATE: May 9, 2006

TO: Ms. Monica Bacon
Historical Research Associate
State of Hawaii, Department of Defense
Office of the Adjutant General
3949 Diamond Head Road
Honolulu, HI 96816-4495

FROM: Kauai Historic Preservation Review Commission *pt*

SUBJECT: Request for comments on the 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment EA for all installations of the Hawaii Army National Guard (HIARNG).

This is to inform you that the Kauai Historic Preservation Review Commission (KHPRC) met on May 4, 2006 to review the above-mentioned project.

The KHPRC would like to thank the HIARNG for its research and documentation and offered the following comments:

- The Kapaa Armory will become 50 years old in 2007 and will become eligible for listing as a historic resource and as such will be subject to the historic preservation review process.
- There is a question regarding the sensitivity analysis for both the Hanapepe and Kekaha sites as we do not understand the criteria for the definitions for the sensitivity analysis and would like further explanation with the possibility of upgrading the analysis to medium sensitivity on these 2 sites especially with the sand dunes at Kekaha.
- Before any changes or projects are undertaken, efforts to solicit public input and the opportunity for review by cultural interests/organizations should take place as well as review by the State Historic Preservation Division.

Because of the complexity of the documents, the KHPRC asked if the deadline for comments could be extended and if a representative from HIARNG attend the June 1, 2006 KHPRC meeting to further explain and discuss these concerns.

Please contact Rick Tsuchiya at (808) 241-6677 should you have any questions regarding this matter.

cc: Susan Tasaki, State Historic Preservation Division
Nancy McMahan, State Historic Preservation Division

LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

APR 12 2006

Environmental Office

Mr. Chris Yuen, Director
County of Hawai'i, Planning Department
Aupuni Center
101 Pauahi Street, Suite 3
Hilo, Hawai'i 96720

Dear Mr. Yuen:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

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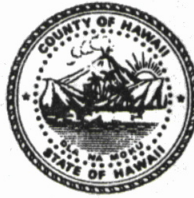
Sincerely,

A handwritten signature in dark ink, appearing to read "Robert G. Lee".

ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

Harry Kim
Mayor



Christopher J. Yuen
Director

Brad Kurokawa, ASLA
LEED® AP
Deputy Director

County of Hawaii
PLANNING DEPARTMENT

101 Pauahi Street, Suite 3 • Hilo, Hawaii 96720-3043
(808) 961-8288 • FAX (808) 961-8742

May 2, 2006

Mr. Robert G. F. Lee
Major General
Hawaii National Guard
Office of the Adjutant General
3949 Diamond Head Road
Honolulu, HI 96816-4495

Dear General Lee:

**Subject: Review of Draft Environmental Assessment (DEA) & Draft
Integrated Cultural Resources Management Plan (ICRMP) for All
Installations of the Hawaii Army National Guard (HIARNG)**

This is in response to your letter dated April 12, 2006 requesting our comments on the above-referenced documents. The HIARNG proposes to implement the statewide ICRMP on seventeen (17) facilities, four of which are located on the island of Hawai'i. An Environmental Assessment is also required by the National Environmental Policy Act and HRS 343 (for installations involving State lands) in order to consider the potential environmental and socio-economic consequences of implementing any actions proposed in the ICRMP. Our comments regarding the four installations on the island of Hawai'i are limited to the scope of the ICRMP and DEA which focus on impacts to cultural resources that may be present on the subject properties.

1. The Hawaii County Zoning Code Section 25-4-11 (c) states: "*Public uses, structures, and buildings and community buildings are permitted uses in any district, provided that the director has issued plan approval for such use.*" Regardless of the County zoning of the parcels that comprise the four HIARNG installations, use by the Hawai'i Army National Guard is considered to be a public and permitted use. However, prior to altering and/or expanding existing structures or adding new ones, certain permits are required which include a Plan Approval by the Planning Director and any applicable building or grading/grubbing permits.

2. The Honoka'a Armory and Motor Vehicle Storage Building (MVSF) are located on TMKs: 4-5-006:071 and 4-5-003:20. Please correct the TMK numbers on page 62 of the ICRMP. The installation's locations have been extensively modified. While the probability is low that any historic, prehistoric or cultural properties are present, Standard Operating Procedure (SOP) #5 should be followed in the event of inadvertent discovery of cultural materials.
3. The Kea'au Armory located on TMK: 1-6-003:058, has a known historic cemetery on-site. The access road to the parcel is the old Waiakea Consolidated Railroad right-of-way. While the treatment of inadvertent discovery of human remains is described in the document, no mention is made of any mitigative measures should sites be discovered in connection with the use of the old railroad right-of-way.
4. The Kealahou Armory is located on TMK: 8-1-002:056. An incorrect TMK number is given on page 70 of the ICRMP. The historic Quonset Huts on the property will be further evaluated in terms of historic value. While the probability is low that any historic, prehistoric or cultural properties are present, SOP #5 should be followed in the event of inadvertent discovery of cultural materials.
5. The Keaukaha Military Reservation (KMR) is identified as being located on TMK: 2-1-012:003. However, the total acreage of this TMK is only 442.486 acres. The ICRMP states on page 75 that the installation's total acreage is 506.25. Please indicate the other TMKs on which this installation is sited. A number of historic structures and other features are located on this installation in addition to a few prehistoric sites, including a portion of the ancient foot trail, the *ala loa* (a.k.a. "The Puna Trail"). Since only 60 percent of the KMR has been inventory level surveyed and un-surveyed portions of the subject property are thickly vegetated, more prehistoric and historic sites may be on the property. What is the target date for completion of the historic preservation program "currently being developed" (referred to on page 80)? Which agency(ies) must review and approve the historic preservation program? Archaeological survey should be conducted prior to any grubbing or grading in vacant and previously undisturbed portions of the KMR.
6. 4.8.2 of the DEA indicates the HIARNG's intention of consulting with Native Hawaiian organizations and Native Hawaiians that may be impacted by the implementation of the ICRMP, even though such consultation is technically not required by federal laws. Isn't such consultation required by State of Hawai'i law (HRS 343) for uses of state or county owned lands? Will a consultation process be developed as part of the ICRMP that ensures meaningful and timely input by Native Hawaiian organizations and individuals, as well as other ethnic/cultural groups, when applicable?

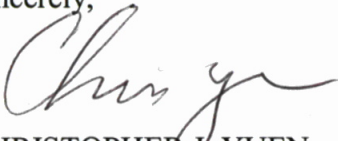
General Robert G. F. Lee

Page 3

May 2, 2006

Thank you for the opportunity to review and comment on the ICRMP and DEA. Should you have questions, please contact Deborah Chang of my staff at 961-8288, Ext. 254.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Yuen", written over the printed name.

CHRISTOPHER J. YUEN
Planning Director

DLC:cd

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LINDA LINGLE
GOVERNOR



ROBERT G. F. LEE
MAJOR GENERAL
ADJUTANT GENERAL

GARY M. ISHIKAWA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

JUL 27 2006

Environmental Office

Mr. Henry Eng, Director
City and County of Honolulu
Department of Permitting and Planning
650 South King Street
Honolulu, Hawai'i 96813

Dear Mr. Eng:

Subject: 2006-2010 Draft Integrated Cultural Resources
Management Plan (ICRMP) and Draft Environmental
Assessment (EA) for All Installations of the
Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

The Public Review period was from April 8 to May 8, 2006, and we apologize for the oversight in not submitting these documents to you at that time. We request that your organization send to the HIARNG, in writing, any comments by August 14, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 672-1282, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

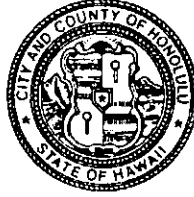
ROBERT G. F. LEE
Major General
Hawaii National Guard
Adjutant General

Enclosures

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 523-4432 • FAX: (808) 527-6743
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

MUFI HANNEMANN
MAYOR



HENRY ENG, FAICP
DIRECTOR

DAVID K. TANOUÉ
DEPUTY DIRECTOR

2006/ELOG-1899(ry)

August 21, 2006

Robert G. F. Lee, Major General
Office of the Adjutant General
Department of Defense
State of Hawaii
3949 Diamond Head road
Honolulu, Hawaii 96816-4495

Dear General Lee:

Re: Integrated Cultural Resources Management Plan for Hawaii Army
National Guard Installations and Draft Environmental Assessment

We have reviewed the subject documents and have no comments to offer. Thank you for the opportunity to comment.

If you have any questions, please contact Raymond Young of our staff at 527-5839.

Very truly yours,


Henry Eng, FAICP, Director
Department of Planning & Permitting

HE:lh
Doc. 473120

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Document Information

AUTHORITY: National Environmental Policy Act (NEPA) of 1969, 32 CFR 651, Environmental Analysis of Army Actions, "Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with the National Environmental Policy Act of 1969 (Mar 02)", and State Hawai'i Environmental Assessment laws (Hawai'i Revised Statutes, Chapter 343).

LEAD AGENCY: National Guard Bureau

TITLE OF PROPOSED ACTION: Implementation of the Hawai'i Army National Guard Integrated Cultural Resources Management Plan, 2008 - 2012

AFFECTED JURISDICTION: State of Hawai'i

PREPARED BY: Orlan Peterson, NEPA Administrator, Hawai'i Army National Guard Environmental Office (808) 672-1280, 3949 Diamond Head Road, Honolulu, Hawai'i 96816-4495

PROPONENTS: Hawai'i Army National Guard and Hawai'i Department of Defense

REVIEWED BY:

REVIEWED BY:

Dean Norwood
Deputy Environmental Officer

Marjean R. Stubbart
LTC, EN, HIARNG
FMO

DOCUMENT DESIGNATION: Environmental Assessment

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**DRAFT FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT
FOR
IMPLEMENTATION OF AN INTEGRATED CULTURAL RESOURCES
MANAGEMENT PLAN
AT HAWAII ARMY NATIONAL GUARD FACILITIES**

INTRODUCTION

The Hawaii Army National Guard (HIARNG) prepared an Environmental Assessment (EA) to identify and evaluate the potential environmental effects of implementing an Integrated Cultural Resources Management Plan (ICRMP) at facilities throughout Hawai'i. The HIARNG prepared the EA in accordance with the National Environmental Policy Act (NEPA) (42 *United States Code* (USC) 4321 to 4370e), the Council on Environmental Quality (CEQ) regulations for Implementing the Procedural Provisions of NEPA (CEQ regulations, 40 CFR Parts 1500 –1508), and *Environmental Analysis of Army Actions* (32 CFR 651).

1. Description of Proposed Action and Alternatives

Proposed Action. The HIARNG proposes to implement the ICRMP for its facilities in Hawai'i during fiscal years 2008 through 2012. Department of Defense Instruction 4715.3, *Environmental Conservation Program*, and Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, require development of an ICRMP. The ICRMP establishes explicit responsibilities, standard operating procedures (SOPs), and long-range goals for managing cultural resources at HIARNG lands, in compliance with all applicable laws and regulations, while ensuring the safety and efficiency of federal and state missions. Cultural resources include historic properties, cultural items, Native Hawaiian sacred sites, collections, and archaeological resources. The Proposed Action is the HIARNG's Preferred Alternative.

Alternatives Considered. In addition to the Proposed Action, the HIARNG analyzed a No-Action Alternative. Current cultural resources management measures would remain in effect under the No-Action Alternative, but there would be no comprehensive plan to integrate mission needs with cultural resources protection. The No-Action Alternative is not viable to the HIARNG because it does not meet the requirements of AR 200-1 and DODI 4715.3. An environmental analysis of a No-Action Alternative is required by CEQ regulations to serve as a benchmark against which the Proposed Action can be evaluated.

2. Environmental Analysis

Based upon the analysis contained in the EA, it has been determined that the known and potential impacts of the Proposed Action on the physical, cultural, and natural environment would be minor and generally positive. Implementation of the HIARNG's ICRMP would result in the efficient management of cultural resources at HIARNG facilities. The goals included in the ICRMP require integration with natural resources, military training, and facilities management. As a result, all cultural, natural, and human resources under the HIARNG's control will receive more consideration and protection than previously afforded. Implementation of the Proposed Action would not result in substantial adverse environmental effects.

Neither the Proposed Action nor the No-Action Alternative creates disproportionately high or adverse human health or environmental effects on children, minority or low-income populations, or communities at, or surrounding, the HIARNG facilities.

The following resource areas were assessed for both alternatives: land use, location and mission, air quality, noise, geology, soils, climate, biological and water resources, cultural resources, and socio-economics. The HIARNG found no major impacts on these resources as a result of implementing the ICRMP; however, minor, localized, short-term disturbance to air quality and soils, as well as noise impacts, may be associated with field activities such as ground surveying, fence building, subsurface testing and data recovery, new construction and maintenance of historic structures, and demolition.

3. Regulations

The Proposed Action would not violate any federal, state, or local environmental regulations. This EA meets the requirements of NEPA, its regulations promulgated by the CEQ, and *Environmental Analysis of Army Actions*.

4. Commitment to Implementation

The National Guard Bureau (NGB) and HIARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation of the Proposed Action is dependent on funding. The HIARNG and the NGB's Environmental Programs Division will ensure that adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in this EA.

5. Public Review and Comment

The draft ICRMP and EA were made available for public review and comment from April 9 to May 8, 2007. The announcement of the availability of the documents was published on Sunday, April 9 in the following newspapers:

The Honolulu Advertiser
Honolulu Star Bulletin

The Moloka'i Island Times
The Maui News
Hawaii Tribune Herald
West Hawaii Today
The Garden Island

Electronic and paper copies of these documents were made available at the HIARNG environmental office, and at the following libraries:

Hawai'i State Library (O'ahu)
Kane'ohe Public Library (O'ahu)
Pearl City Public Library (O'ahu)
Kaimuki Public Library (O'ahu)
Lihu'e Public Library (Kaua'i)
Moloka'i Public Library (Moloka'i)
Kahului Public Library (Maui)
Hilo Public Library (Hawai'i)
Kailua-Kona Public Library (Hawai'i)

The draft public comment period ended May 8, and 16 comments (from 3 response letters) were received relating to the ICRMP, and 3 comments (from 2 response letters) specifically commented on the draft EA.

The final ICRMP/EA and draft Finding of No Significant Impacts (FNSI) will be available for public review and comment for 30 days after publication of the notice of availability. The final ICRMP/EA and draft FNSI will be available for review at locations listed in the notice of availability. Written comments may be submitted to the HIARNG, Environmental Office, ATTN: Ms. Angela Kieran-Vast, 3949 Diamond Head Rd., Honolulu, HI 96816.

6. Finding of No Significant Impact

Based on the information presented in the final EA, the HIARNG proposes to implement the Preferred Alternative. Once public comments have been addressed and if a determination is made that the Proposed Action will have no significant impact, the FNSI will be signed and the action will be implemented. The requirements of NEPA and the CEQ regulations will have been met. An Environmental Impact Statement will not be prepared, and the National Guard Bureau will issue this FNSI.

Date

Jeffrey G. Phillips
Colonel, US Army
Chief, Environmental Programs Division

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APPENDIX C

PLANNING LEVEL SURVEY AND HISTORIC CONTEXTS

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C.1 Planning Level Surveys

Numerous Section 110 planning surveys and Section 106 compliance surveys, studies, and mitigation has been conducted at HIARNG installations. Reports from previous surveys and studies in HIARNG possession or located, scanned, and an electronic copy included with the report library submission with the 2016-2021 ICRMP are shown in **Table C-1**. Reports that could not be located and are not included on the ICRMP Report Library CD are shaded in **Table C-1**.

Table C-1. Reports from Previous Surveys and Studies.

Installation, Island	Author (s)	Date	Title
Statewide	Burns and McDonnell Engineering Company, Inc.	2004	Volume V Draft Final Historic Context Study: Cold War Era (Post WWII Era) (1946–1989).
Statewide	SEARCH	2015	Integrated Cultural Resources Management Plan Update
Statewide	Wil Chee	1998	Hawaii Army National Guard Cultural Resources Management Plan
Statewide	engineering-environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation Report of Ten Facilities Hawaii Army National Guard
Statewide	HIARNG	2008	Integrated Cultural Resources Management Plan: Hawaii Army National Guard Installation Final Environmental Assessment.
5 Installations, 3 Islands	Blackwell and Barnes	2014	Final Historic Building Survey and Evaluation Report at Hanapepe RC and Kekaha WETS, Kauai; Ft. Ruger, and Waiawa Gulch UTES & RTSM, Oahu; and KMR, Hawaii, Hawaii Army National Guard
Keaau, RC Hawaii	Hunt, Terry	1993	Archaeological Assessment of Shipman Lands in Keaau, Puna, Island of Hawaii.
Kealakekua RC, Hawaii	McGerty, Leanne and Michael Dega	1999	Addendum Report: An Archaeological Inventory Survey & Limited Sub-Surface Testing 1,540 Acre Parcel. Honuaino, Hokukano, Kanaeue, Halekii, Keekee, Ilikahi, Kanahau, Kalukalu & Onouli, N & S Kona.
KMR, Hawaii	AMEC	2007	Final Environmental Assessment Construction and Demolition Projects at the Keaukaha Military Reservation Hilo, Hawaii
KMR, Hawaii	AMEC Earth and Environmental, Inc.	2006	A Historic Building Survey-Keaukaha Military Reservation, Hilo, Hawaii.
KMR, Hawaii	Creed V., H. H. Hammatt, G. K. Ida, I. Masterson, and J. Winieski	1995	Summary of the Archaeological Monitoring for the Kapaa Sewer line Project Waipouli and Kapaa Ahupuaa, Puna District, Kauai.

Installation, Island	Author (s)	Date	Title
KMR, Hawaii	Devereaux, T. K., D. F. Borthwick, H. H. Hammatt, and M. Orr	1997	Archaeological Reconnaissance Survey of Keaukaha Military Reservation, South Hilo District, Hawaii Island (Hawaii National Guard) 503.6 –acre Parcel, (TMK: 2-1-12:3 and 2-1-13: 10).
KMR, Hawaii	Escott, Glenn G. and Wendy Tolleson	2002	Archaeological Inventory Survey at Keaukaha Military Reservation, South Hilo District, Island of Hawai'i [TMK 2-1-12:3 and 2-1-13:10].
KMR, Hawaii	HIARNG	2008	Final Integrated Wildfire Management Plan, Kekaha Firing Range, Kauai, Keaukaha Military Reservation, Hawaii, Regional Training Institute, O'ahu, and Ukumehame Firing Range.
KMR, Hawaii	HIARNG	2006	A Historic Building Survey for the Keaukaha Military Reservation, Hilo, Hawaii.
KMR, Hawaii	Hammatt, Hallett H. and Anthony R. Bush	2000	Archaeological Inventory Survey of Selected Portions of the Hawai'i Army National Guard 503.6-acre Keaukaha Military Reservation, Waiakea Ahupuaa, South Hilo District, Hawaii Island, TMK: 2-1-12:3 and 2-1-13:10.
KMR, Hawaii	Inter Island Environmental Services, Inc	1997	Preliminary Assessment at Keaukaha Military Reservation for Hawaii National Guard.
KMR, Hawaii	Lass B, K Maly	1997	Reconnaissance Survey Along the Old Government Road, Keaau, Puna, Island of Hawaii.
KMR, Hawaii	Maly, K, A T Walker, and P Rosendahl	1994	Archaeological Inventory Survey Waiākea Cane Lots Portion of Parcel 6 Land of Waiakea, South Hilo District.
KMR, Hawaii	National Park Service	2007	Building 003 (Nurses' Cottage Keaukaha Military Reservation Hilo Vicinity, Hawaii County, Hawaii) Written Historical and Descriptive Data HABS No. HI-540.
KMR, Hawaii	Scherer, Mathia, Jon Borr	2006	A Historic Building Survey for KMR, Hilo Hawaii.
KMR, Hawaii	Tolleson, Wendy L. and William Godby	2001	From Trail to Road: A Late historic Way Station on the Puna Trail on the Hawaii Army National Guard Keaukaha Military Reservation, Hilo, Hawaii Island (TMK: 21-1-13 & 10 and 2-1-12:3) .
KMR, Hawaii	Wheeler et al.	2014	Draft Archaeological Inventory Survey, Phase I, Keaukaha Military Reservation (KMR) Hawaii Army National Guard Facility Waiākea Ahupuaa, South Hilo District, Island of Hawaii TMKs: [3] 2-1-012:003, 131 and [3] 2-1-013:010.
Puunene RC, Maui	Bordner, R and C Patteys	1979	Archaeological Surface Survey Paukukalo House Lots, Unit 3, Wailuku, Maui, Hawaii
Puunene RC, Maui	Drolet, Robert and Aki Sinoto	1998	An Archaeological Inventory Survey of the Proposed Army National Guard Planning Area Pulehunui Ahupuaa, Wailuku, Maui (TMK: 3-8-08: Por 1)

Installation, Island	Author (s)	Date	Title
Puunene RC, Maui	Keau, C. and S. Murray	1977	Archaeological Walk-Through Survey, Paukukalo Hawaiian Homes, Phase III. (TNK 3-3-06:1-41, 52.
Puunene RC, Maui	Kennedy, J.P.	1983	Archaeological Walk-Through Reconnaissance at Wailuku Project District #3 at Pihana Project District #2, Wailuku, Maui (TMK: 3-3,3-4,3-5).
Puunene RC, Maui	The Maui Military Museum	1996	Establishment of Excavation Zone Within Former Fieldside Maintenance Apron: Subsurface Survey and Recovery Proposal for a Property at TMK: 3-8-008 The Portion of General Lease S-4197 from the State of Hawaii to Alexander & Baldwin, Inc. Parcel 01, Located in Pulehunui Wailuku District, Island of Maui.
Puunene RC, Maui	Tome, Gueria and Michael Dega	2012	An Archaeological Inventory Survey of an Approximate 917 Meter Long Alternate Access Road and an 86.029 Acre Property in Puunene, Pulehu Nui Ahupuaa, Wailuku District, Island of Maui, Hawaii (TMK 2-3-8-008: Por 005, Por. 006, and 19).
Puunene RC, Maui	Tuggle, M.J., H. David Tuggle, Dawn E Duesing, Coral Magnuson, Usha K. Prasad	2000	Fire on the Land: Archaeology, Architecture, and Oral Historic of Former Naval Air Station Puunene, Pulehunui, Maui.
Puunene RC, Maui	HIARNG	2002	Final Environmental Assessment, Construction of the Hawaii Army National Guard's Maui Consolidated Readiness Center Pulehunui (Puunene), Maui, Hawaii
Ukumehame WETS, Maui	Sinoto, A	1997	An Archaeological Assessment of the Native Plant Conservatory Project, Ukumehame Firing Range, Ukumehame, Lahaina, Maui TMK 4-8-2:47
Kaunakakai RC, Molokai	Anderson, Lis	1997	Legacy Resource Management Program Project for the Preservation Study of the Hawaiian Cannon at the Army National Guard Armory, Kaunakakai, Island of Molokai, Hawaii. On file at Kaunakakai RC.
Kaunakakai RC, Molokai	Kaunakakai Armory	n.d	History of the Molokai Armory
Ft. Ruger, Oahu	Hibbard, Don and Nathan Napoka	1983	Ft. Ruger Historic District
Ft. Ruger, Oahu	Pacific Planners Corporation	n.d	History of Diamond Head
Ft. Ruger, Oahu	R.M. Towill Corporation	2000	Restoration Feasibility Evaluation for Battery Harlow, Ft. Ruger, Honolulu, Hawaii.
Ft. Ruger, Oahu	Tuggle, M. J and Roger Blankfein	1997	An Archaeological and Historical Assessment of the Federal Aviation Administration CERAP in Diamond Head Crater
Ft. Ruger, Oahu	Tuggle, M. J and Roger Blankfein	1998	Exploring a Backdrop to Waikiki's Past: Historical Research and Archaeological Assessment of Diamond Head State Monument, O'ahu

Installation, Island	Author (s)	Date	Title
Kalaeloa RC, Oahu	Ahlo, Hamilton M., Jr., and Robert J. Hommon	1983	An Archaeological Reconnaissance Survey of the Site of the Proposed Solid Waste Processing and Resource Recovery Facility, Honouliuli, Ewa, Oahu,
Kalaeloa RC, Oahu	Ahlo, Hamilton M., Jr., and Robert J. Hommon	1984	Archaeological Test Excavations at the Site of the Proposed Solid Waste Processing and Resource Recovery Facility, Honouliuli
Kalaeloa RC, Oahu	Barrera, William M., Jr.	1975	A Report on the Archaeological Reconnaissance Survey of the Proposed Barber's Point Harbor Area.
Kalaeloa RC, Oahu	Barrera, William M., Jr.	1979	West Beach, O'ahu: An Archaeological Survey.
Kalaeloa RC, Oahu	Barrera, William M., Jr.	1984	West Beach, O'ahu: Archaeological Status Report. TMK: 9-1-14:2, 9-2-13:3,7,2 0-1-15:3,6,7,10,4
Kalaeloa RC, Oahu	Barrera, William M., Jr.	1986	West Beach, Oahu Archaeological Investigations
Kalaeloa RC, Oahu	Denfeld, C.	1995	History of Naval Air Station, Barbers Point and Survey of Cold War Facilities. For History of NAS and Cold War Facilities Survey of Barbers Point.
Kalaeloa RC, Oahu	Department of the Navy	2008	Environmental Assessment Conveyance of Navy Retained Land and Utility Systems, Kalaeloa,Oahu, Hawaii.
Kalaeloa RC, Oahu	Department of the Navy	1994	NAS Barbers Point Final Environmental Baseline Survey In Environmental Impact Statement for the Disposal and Reuse of Naval Air Station Barbers Point, Hawaii
Kalaeloa RC, Oahu	Goodman, Wendy L.	1991	Archaeological Reconnaissance and Inventory Surveys of 3,600 Acres in Waiawa Ahupua'a, 'Ewa, O'ahu.
Kalaeloa RC, Oahu	Hammatt, Hallett H. and David W. Shideler	2012	Final Archaeological Assessment Survey (CRAS) Phase I: Background Research and Surface Survey For the Hawaii Army National Guard Kalaeloa Facility, Former NAS Barbers Point, Kapolei, Honouliuli Ahupuaa, Ewa District, O'ahu Island, TMK: 1-9-1-013:-0045, 046, 032 por. State of Hawaii Department of Defense Job No. CA- 1223
Kalaeloa RC, Oahu	HIARNG	2010	Final Environmental Assessment for the Relocation of Units and Construction Projects at the Kalaeloa Hawaii Army National Guard Facility Oahu, Hawaii
Kalaeloa RC, Oahu	HIARNG	2003	Final Environmental Assessment for the Relocation and Consolidation of the Hawaii Army National Guard to Kalaeloa, Oahu, Hawaii: Including Construction and Renovation of New and Existing Buildings and Infrastructure.
Kalaeloa RC, Oahu	Historic American Buildings Survey (HABS)	1999	HABS No. HI-279-J, Naval Air Station Barber's Point, Power Plant (Facility No. 91).

Installation, Island	Author (s)	Date	Title
Kalaeloa RC, Oahu	Historic American Buildings Survey (HABS)	1999	HABS No. HI-279-O, Naval Air Station Barber's Point, Assembly and Repair Shop (Maintenance Hangar, Facility No. 117).
Kalaeloa RC, Oahu	Landrum, Jim and A. J. Schilz	1993	Archaeological Reconnaissance and Limited Subsurface Testing at the Proposed Family Housing Construction Area Project No. 34863, Barber's Point Naval Air Station, Honouliuli Ahupuaa, Ewa District, Oahu Island.
Kalaeloa RC, Oahu	NGB	2003	Environmental Assessment for the Relocation and Consolidation of the Hawaii Army National Guard to Kalaeloa, O'ahu, Hawaii: Including Construction and Renovation of New and Existing Buildings and Infrastructure.
Kalaeloa RC, Oahu	Pacific Legacy	2006	Proposed Ke Kama Pono Program Facility Kalaeloa, O'ahu Archaeological Monitoring Report
Kalaeloa RC, Oahu	R. Spencer Mason Architects	1993	Survey and Evaluation of the Existing Built Environment and Assessment of Impacts of Proposed Family Housing Project at Naval Air Station Barber's Point on Architectural Resources.
Kalaeloa RC, Oahu	Tuggle, David	1995	Archaeological Inventory Survey for Construction Projects at Naval Air Station Barbers Point, O'ahu, Hawaii.
Kalaeloa RC, Oahu	Tomonari-Tuggle, M.J., D. Colt Denfeld, Roger Blankfein, and Ann Yoklavich	1997	A Cultural Resource Inventory of Naval Air Station, Barber's Point, Oahu, Hawaii; Part I: Phase I Survey and Inventory Summary.
Kalaeloa RC, Oahu	Tuggle, HD, and M Tomonari-Tuggle	1999	Cultural Resources Management Plan: Naval Air Station, Barbers Point.
Kalaeloa RC, Oahu	University of Hawaii	2012	Draft Environmental Assessment: University of Hawaii Pacific Health Research Laboratory at Kalaeloa.
Kalaeloa RC, Oahu	Yoklavich, Anne, A.K. Drolet, and P. Drolet	1995	Cultural Resources Management Overview Survey, Naval Air Station, Barber's Point, Oahu, Hawaii.
RTI, Oahu	Biosystems	1993	Cultural Resource Management Plan for Native Hawaiian Archaeological Resources, Bellows Air Force Station.
RTI, Oahu	Farrell, Nancy and Robert L. Spear	1997	Cultural Resources Management Plan (CRMP) for Bellows Air Force Station, Waimanalo, Koolau-poko, Island of Oahu, Hawaii.
RTI, Oahu	Hammatt, Hallett H. and David W. Shideler	1989	Archaeological Survey and Testing at Bellows Air Force Station for New Antennas and Trench Lines, Waimanalo, Koolau-poko, Oahu.
RTI, Oahu	Hurlbett, Robert E. and Alan E. Haun	1987	Task Product 4: Cultural Resource Inventory, Evaluation, and Recommendations, Subtask 4a: Inventory and Evaluation, Cultural Resource Management Plan (CRMP), Bellows Air Force Station, Oahu, Hawaii.

Installation, Island	Author (s)	Date	Title
RTI, Oahu	Pearson, RJ, PV Kirch, and M Pietrusewsky	1971	An Early Prehistoric Site at Bellows Beach, Waimanalo, Oahu, Hawaiian Islands
RTI, Oahu	Tuggle, H. David and Tom Dye	1999	Cultural Resources Inventory Survey for the Hawaii Army National Guard Training Academy, Bellows Air Force Station, Waimanalo, Island of Oahu, Hawaii
RTI, Oahu	Yoklavich, Ann and Spencer Leineweber	1997	Architectural Inventory and Evaluation of Pre-1950 Military Resources at Bellows Air Force Station, O'ahu, Hawaii. Appendix F in N. Femell and R.L. Spear, Cultural Resources Management Plan (CRMP) for Bellows Air Force Station, Waimanalo, Koolaupoko, Island of Oahu, Hawai'i.
Waiawa Gulch UTES & RTSM, Oahu	R. Spencer Mason Architects	2002	Assessment of Buildings at Waiawa Gulch Unit Training Equipment.
Waiawa Gulch UTES & RTSM, Oahu	R. Spencer Mason Architects	2003	HABS Documentation for Building 22, Gulch UTES.
Waiawa Gulch UTES & RTSM, Oahu	HIARNG	2006	Archaeological Monitoring Plan for Removal and Disposal of Contaminated Soils from Waiawa Gulch Unit Training Equipment Site, Island of Oahu, Hawaii
WAAF Oahu	Tomonari-Tuggle, M and A Yoklavich	2000	Wheeler Army Airfield Cultural Resource Management Plan.
Kapaa RC, Kauai	Kapaa Armory	n.d	The History of the HIARNG of Kauai. November 10, 1915 thru February 11, 1983.
Kekaha WETS, Kauai	Folk, William and Hallett Hammatt	1994	Archaeological Inventory Survey and Subsurface Testing at the Hawaii National Guard Firing Range at Kekaha, Kauai

C.2 History of the Hawaii National Guard

C.2.1 Early History-Kingdom of Hawaii

This history of the Hawaii Army National Guard is condensed from two definitive sources. The first is "History of the Hawaii National Guard from Feudal Times to June 30, 1935" by Charles Lamoreaux Warfield, Second Lieutenant, Q.M. Reserve, U.S. Army, which was presented as a Master's thesis in history at the University of Hawaii in 1935. The second is "Hawaii's Military Heritage: Polynesian to Annexation" by Colonel Walter F. Judd, a member of the Hawaii Army National Guard and a local historian, that was given to the Guard in 1977.

The beginnings of the Hawaii Army National Guard lie in the brief takeover of the Hawaiian Monarchy by the British in 1843. The British Commander to Hawaii, Lord George Paulet, seized the islands to arrest France's proposed takeover. In charge for several months, Paulet organized the Native troops into a

military force consisting of 200 regular troops, plus 250 “Militia Men”--troops paid by the government. The Militia consisted of four captains, four First Lieutenants, four Second Lieutenants, sixteen sergeants, sixteen corporals, and about two hundred privates. A private earned 10 cents a day.

In 1854, King Kamehameha III, just before his death, attempted to reorganize the military system through a law titled “An Act to Establish a Militia in the Hawaiian Islands” to gather all the disparate forces in the kingdom into one unit that could quickly respond to a call by the Monarchy. The King died before institution of the Act. In 1857, prominent community businessmen formed a volunteer infantry called the Honolulu Rifles, and in 1860, the First Hawaiian Cavalry. Prior to disbanding by the King in 1873, these two units and regular troops of the kingdom constituted the military force in Hawaii.

Kamehameha IV died in 1872 without an heir or naming a successor to the throne. Prince Liholiho’s claim to the throne surmounted Prince David Kalakaua’s, but Liholiho died within the year. Kalakaua’s election resulted in a riot by the supporters of Queen Emma and the militia refused to respond to the King. King Kalakaua required a strong militia, and Attorney General Hartwell organized fifty men into a militia force called the “King’s Guard.” Kalakaua organized an infantry company of native Hawaiians called the *Mamalahoas*. In 1883, as a result of rising political tensions in the kingdom, many Caucasians felt that a militia was needed and revived the Honolulu Rifles.

In 1889, Robert Wilcox, a European educated Hawaiian, sponsored a revolt supporting the monarchy of Princess Liliu’okalani for Queen. Wilcox worked in secret to organize a native rifle club and on the morning of July 20, 1889 he and 150 followers took possession of the Government Building and the Palace Grounds. The King’s Guard stayed neutral, remaining in the barracks. The Honolulu Rifles confronted the insurgents. The insurgents retreated to a small building on the palace grounds, and returned fire. The fighting killed seven and injured a score before the revolutionists surrendered the following day. Queen Liliu’okalani ascended the throne of Hawaii in 1891, though the Ministry soundly denied a new constitution she put forth. Instead, on January 19, 1893, a committee called for the abolition of the Monarchy and the establishment of a provisional government, with Judge Sanford B. Dole as President. Military forces of the Provisional Government of Hawaii, led by Colonel John Soper, formed a volunteer force. On Jan 27, 1893, the Executive and Advisory Council passed “An Act Providing for the Formation of the National Guard of Hawaii” with Colonel Soper as Commander of the military. The National Guard structure followed the U.S. Army structure. On February 1, 1893, Minister Stevens raised the American flag with a proclamation placing the Hawaiian Islands under the protection of the United States. The volunteer guards and militia were relieved from active duty. The eight Austrian artillery pieces purchased by Kalakaua became the property of the Provisional Government (the only remaining piece is located at the National Guard armory on the island of Molokai). The National Guard then moved into the Iolani Palace Barracks.

C.2.2 The National Guard in the Republic of Hawaii

Believing the protection illegal, on March 31, 1889, President Grover Cleveland withdrew American troops protecting the Hawaiian government. With the removal of the U.S. protectorate, the National Guard rose in importance to the residents. On April 1, 1893, the National Guard consisted of two companies of regular troops (Companies A and E), two companies of volunteer infantry (Companies B and C), one company of volunteer artillery (Company D), and a Band and Drum Corps, with a total troop strength of 450 men.

On June 30, 1893, President Dole declared Martial Law on Kauai. He sent Colonel Soper to assist the civil authorities in relocating a colony of lepers from Kalalau Valley to the Kalaupapa leper colony on Molokai. Two National Guardsmen were killed and most of the lepers captured in several skirmishes up the valley. President Dole withdrew the Guard and left the dispute with the civil authorities on Kauai. The National Guard fought during the Battle of Diamond Head. This battle resulted from a botched rebellion attempt. Native Hawaiians recruited by rebellion leaders opened fire on police who were searching for arms and ammunition in a house the rebels occupied. The rebels killed one man. One of the Austrian artillery pieces was loaded onto the tug “Eleu” and set out for Diamond Head. The cannon and Company E fought through the day, killing five rebels. That night the rebels fled with their leader, Robert Wilcox. The National Guard sent a field piece and six sharpshooters to quell rebels on Punchbowl. In what is known as the Battle of Moiliili, rebels exchanged heavy fire with Guardsmen while hiding in the extinct crater of Punchbowl. After heavy fire with the artillery piece, the group gave up. Three were dead and several wounded. The following day, the National Guard pursued the main body of rebels retreating up Manoa valley to hide in the mountains. A detachment from Company D with five field pieces, Company A, and a company of sharpshooters harassed the rebels up the valley. Some surrendered, three were dead, and the rest moved into the mountains to make their own terms with the government. The National Guard spent the next week searching every valley for the leaders of the rebellion, capturing Robert Wilcox and Sam Nowlein within the week.

During the year of 1895 recruiting for two more companies (G and H) occurred. The National Guard consisted of two regular companies, Companies E and F, six volunteer companies (companies A, B, C, D, G, and H), a company of Sharpshooters, and the Citizen Guard. Majors led the First Regiment, divided into two battalions, with four companies in each battalion.

C.2.3 The National Guard from Annexation through World War I

Annexation of Hawaii occurred on August 12, 1898, as the Spanish-American War was breaking out. United States troops were to take over the Palace and the Executive Building, and the Guard prepared for disbandment. However, the National Guard had exclusive use of the Drill Shed and the Iolani Palace Barracks, as these were unsuitable for the U.S. troops. The next deployment occurred in December 1899 during a cholera epidemic in Chinatown. The Guard cordoned off and guarded Chinatown. During the epidemic, a fire broke out in Chinatown. Those forced from their homes by the epidemic or fire received help from the U.S. Government in the form of tents, blankets, and clothing. The National Guard guarded the detention camp that held the sick and homeless.

On June 14, 1900, the Republic of Hawaii became the Territory of Hawaii. In 1902, Congress passed “A Bill to Promote the Efficiency of the Militia and Other Purposes.” The act coordinated and standardized the National Guard organizations of the various states to form an efficient fighting force, including the establishment of an Adjutant General post. During the decade following annexation the Guard’s military efficiency increased, though not without financial problems. National Guard numbers ebbed and flowed over the next ten years due to funding shortages. In 1908, Hilo had a company, with two on the Island of Maui, one on Kauai, and eight in Honolulu. The Guard grew by organizing volunteer Infantry requiring limited or no pay. A company mustered into the First Regiment at Hilo as Company D. Another formed as Company E in Honolulu, and Company I mustered at Wailuku, Maui.

In 1910, eight hundred Russian immigrants arrived in Honolulu to work in the cane fields. Infected with diphtheria, the Board of Health quarantined them in a camp, requesting Guard assistance in caring for the sick, and to guard the camp. In 1911, a yellow fever epidemic broke out in Honolulu, and the Guard

assisted with treatment and guarded the camp set up in the Kalihi area. In 1913, Lahaina completed an armory and assurances of funding for armories spurred a recruiting campaign to bring the First Infantry up to twelve companies. In 1915, Companies A, B, C, and D became the First Battalion, Second Infantry; Companies E, F, G, and H became the Second Battalion, Second Infantry; and Companies I, K, L, and M became the Third Battalion, Second Infantry. In 1915, the Guard expanded again. In 1916, Field Company A, Signal Corp mustered into service, with permission to muster four new companies of Coastal Artillery. By July 1916, the strength of the Hawaii Army National Guard was five thousand. Finally, the War Department federalized the Guard to prepare for the coming war. Large sugar plantations assisted the Guard by urging workers to join, transported them to and from their meeting places, and loaned land and buildings for armories, storehouses, drilling fields, and target ranges. Today, some of these are still Guard property. When the U.S. entered the World War I, four regiments took over for regular Army regiments as the regular Army units moved overseas from stations at Ft. Shafter and Schofield Barracks. The Guard regiments demobilized after the Armistice.

C.2.4 The National Guard from World War I to the Present

After demobilization, the Guard consisted of a small force designated to care for federal and territory properties and to care for armories. The “new” National Guard came into existence in 1918 around the Fifth Infantry. By 1923, the strength of the Guard stood at 1,306 men. In 1923, the designation of the First Infantry was changed to the 298th Infantry on Oahu and the 299th Infantry on Hawaii and Maui.

The National Guard re-mobilized in 1946 after the end of World War II. Since this time, the Hawaii Army National Guard has served in Korea, Vietnam, the Gulf War, and the war on terrorism. Today, the HIARNG’s *federal mission* is to serve as an integral component of the Total Army by providing fully-manned, operationally-ready, and well-equipped units that can respond to any national contingency ranging from war and peacekeeping missions to nation-building operations. The *state mission* of the HIARNG is to provide a highly effective, professional, and organized force capable of supporting and assisting civilian authorities in response to natural disasters, human-caused crises, or the unique needs of the state and its communities.

Commanded by the State of Hawaii’s Adjutant General, the HIARNG is composed of a Headquarters, Hawaii Army National Guard (HQ HIARNG) and three major commands: the 29th Separate Infantry Brigade (29 SIB), the 103rd Troop Command, and the 298th Regiment-Multifunctional, Regional Training Institute (298th RTI). HIARNG units and installations are located in communities on the islands of Hawaii, Maui, Oahu, Molokai, and Kauai.

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APPENDIX D

VIRTUAL INSTALLATION OVERVIEW

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Virtual Installation Overview

This appendix provides a brief description of the HIARNG virtual installation, an overview of all known cultural resources within the HIARNG virtual installation, and the status of those resources at each site and training installation. This chapter also identifies areas where cultural resources could exist, however, sufficient research has not been completed to identify these potential and unknown resources.

As stated in Chapter 1, the HIARNG has a dual mission. The federal mission is to maintain properly trained and equipped units available for prompt mobilization for war, national emergency, or as otherwise needed. The state mission is to provide trained and disciplined forces for domestic emergencies or as otherwise required by state laws. The Army also has an environmental mission to sustain the environment to enable the Army mission and secure the future.

The state mission provides for the protection of life and property and to preserve peace, order, and public safety under the competent orders of the state governor. The HIARNG comprises the following:

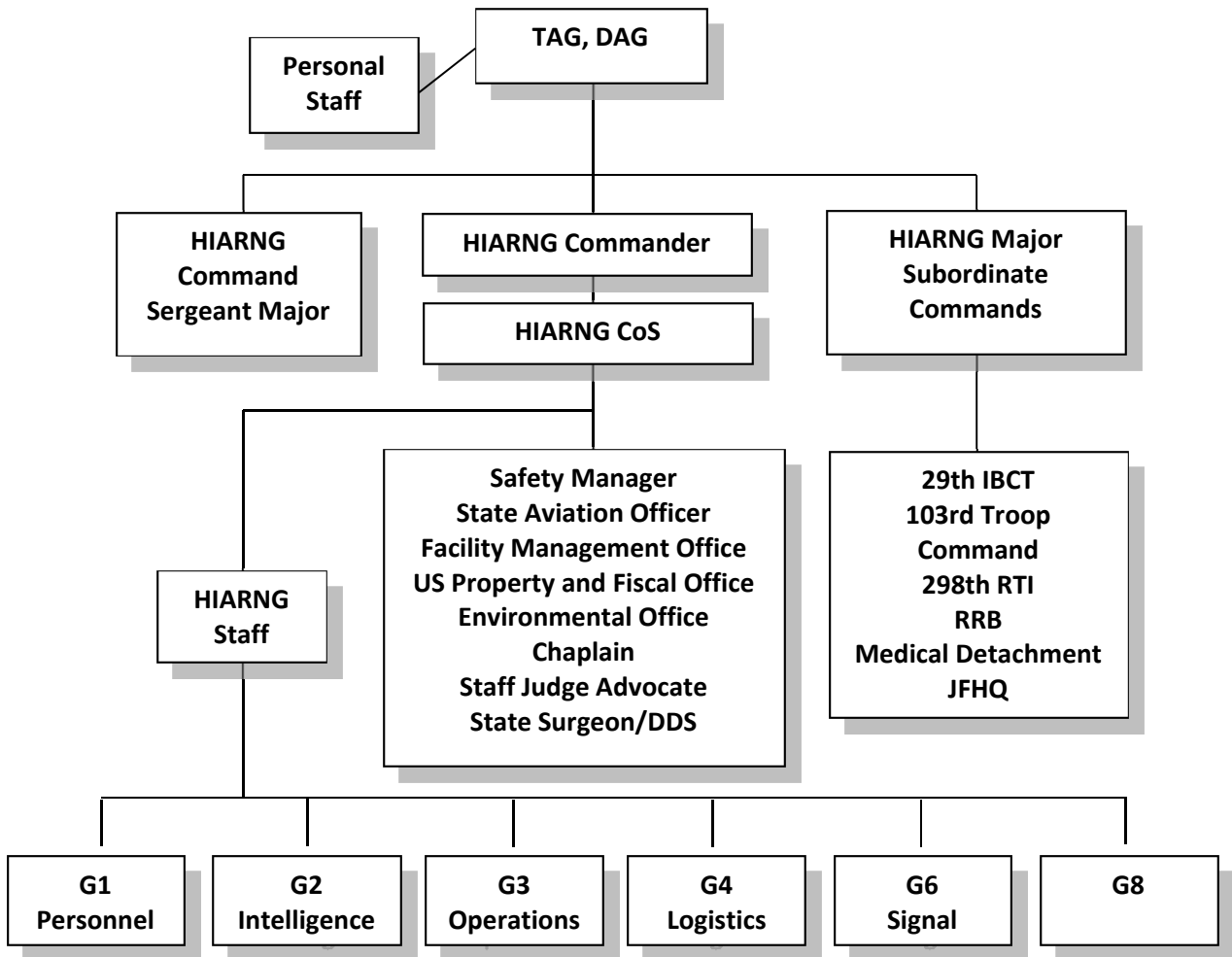
Elements

- Command
- G1 Personnel
- G2 Intelligence
- G3 Operations
- G4 Logistics
- G6 Signal
 - Deputy Chief of Staff for Information Management (DCSIM)
- Safety and Occupational Health Office
- Aviation Officer
- Facilities Management Office (FMO)
- US Property and Fiscal Office (USPFO)
- Environmental Office (ENV)
- Chaplain
- Staff Judge Advocate
- Office of the State Surgeon/DDS
- Office of the State Surgeon

Units

- Major Subordinate Commands
 - 29th Infantry Brigade Combat Team
 - 103rd Troop Command
 - 298th Regiment, RTI
 - Recruitment Retention Brigade RRB
 - Medical Detachment
 - Joint Force Headquarters

HIARNG Installations are classified as Sites and Training Installations and Readiness Centers (RC). There are 8 individual sites and training installations that support the HIARNG mission by providing training locales, maintaining and storing equipment and weapons, and housing HIARNG staff. There are 8 RC that support individual and collective training, administration, automation and communications, and logistical requirements. Locations of HIARNG sites and training installations and the RC are shown in the **HIARNG Organizational Chart** on the following page. The installations are presented in this ICRMP by island, southeast to northwest across the main Hawaiian Islands, from Hawaii to Kauai.



HIARNG Organizational Chart

Table D-1. HIARNG Sites and Training Installations.

Code	Installation, Island	Address	Acreage	Support	T.M.K
15A55	Keaau RC, Hawaii	PO Box 256 Keaau, HI 96749	3	100% State	1-6-03-58
15A60	Kealakekua RC, Hawaii	81-1032 Nani Kapuna Pl Kealakekua, HI 96750	4.25	Federal & State	8-1-05-56
15A10	KMR, Hawaii	1046 Leilani St Hilo, HI 96720	509	Federal & State	2-1-13-10 & 2-1-12-3
15A12	Hilo AASF #2	10495 Kekuanaoa St Hilo, HI 96720	8	Federal & State	2-1-12-3
15B10	Puunene RC, Maui	2701 Mokulele Hwy Kihei, HI 96753	30	Federal & State	3-8-08-14
15A67	Ukumehame WETS, Maui	Honoapiilani Hwy Ukumehame, Maui 96761	39.28	100% State	4-8-02-47
15A50	Kaunakakai RC, Molokai	220 Puali Pl Kaunakakai HI 96748	2.5	Federal & State	5-3-9-7
15A20	Ft. Ruger, Oahu	3949 Diamond Head Road, Honolulu, HI 96816	325	Federal & State	3-1-42-18, 19, 41 & 6
15001	Kalaeloa RC, Oahu	91-1227 Enterprise Ave. Kapolei HI 96707	147	Federal & State	9-1-13-45 & 50
15B05	RTI, Oahu	711 Tinker Road, Waimanalo, HI 96795	48	100% Federal	LIC DACA 84-3- 00-26
15A90/ 15A91	Wahiawa RC, Oahu	230 Kamehameha Hwy, Wahiawa, HI 96786	10	Federal & State	7-6-01-02 & LIC DACA84-3-79- 19
15993/ 15891	Waiawa UTES & RTSM, Oahu	96-1230 Waihona St. Pearl City, HI 96782	22	Federal & State	9-6-04-15 & 9-6-04-20
15A95	WAAF, Oahu	1935 Santos Dumont Schofield Brks, HI 96857	31	100% Federal	7-7-01-02
15A05	Hanapepe RC, Kauai	13-460 Kaumualii Hwy. Hanapepe HI 96716	3.2	Federal & State	1-8-08-77 & 78
15A40	Kapaa RC, Kauai	4670 Kahau Rd. Kappa HI 96746	3.3	100% State	4-5-15-05
15A65	Kekaha WETS Kauai	Kaumualii Hwy Kekaha, Hawaii 96752	68	100% State	1-2-02-21

The following sections provide brief descriptions of the infrastructure at each HIARNG site and training installation, and summaries of the status of Section 110 inventories and evaluations completed for each. **Appendix C** provides historic context information. Information on known cultural resources and cultural

resources investigations has been entered into the ICRMP database or HIARNG geodatabase for each site and training installation.

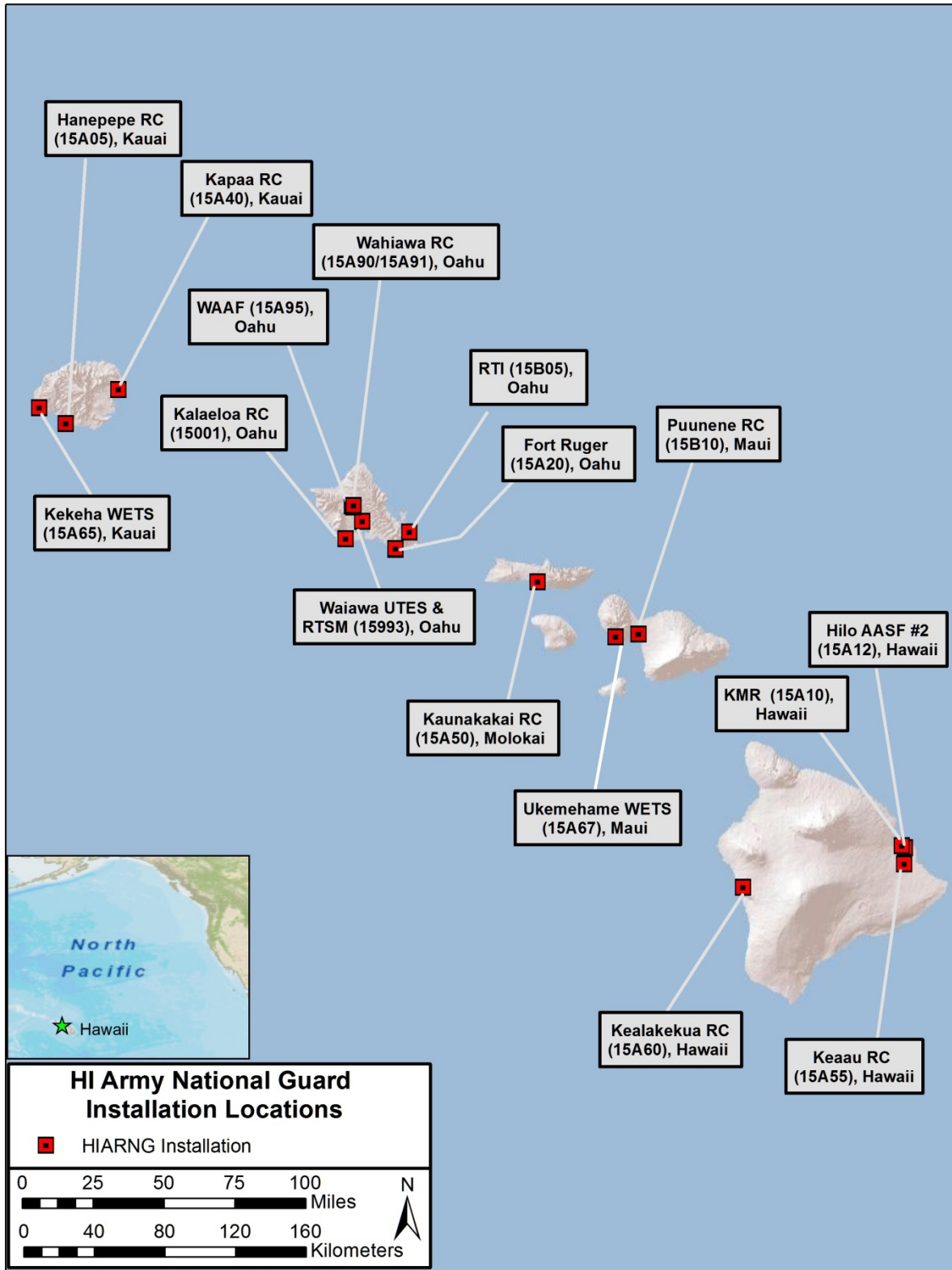


Figure D-1. HIARNG Sites and Training Installations.

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D.1 Keaau RC (15A55), Hawaii



Figure D-2. Keaau RC Cultural Resources.

District: Puna **County:** Hawaii **Town/Area:** Keaau
Pride Installation Code: 15A55
TMK #: 1-6-003: 058
Support: 100% State
Total Acreage: 3 acres

D.1.1 Description and Background



The Keaau RC is located in the town of Keaau on the eastern side of the island of Hawaii. The RC is a 3-acre parcel located on former condemned sugar cane lands. The rocky soil is highly erodible and not suited for agriculture forcing fill to be brought into the area. The surrounding area is developed due to the railroad and the many camps that were adjacent to the tracks. The facility consists of a one-unit RC built in 1957, a mess shelter built in 1985, flammable materials storehouse built in 1986, and a hazardous materials building constructed in the late 1990s.

The facility lies in abandoned sugar cane fields owned by the Shipman Company, and near residences for the town of Keaau. The Shipman's have owned the property since 1885; in 1899 they leased the property to Olaa Sugar for 40 years. Between 1900 and 1905, the sugar company built a railroad, a mill, language schools, and a cemetery. Keaau town is the former Nine Mile Camp, a company town for cane plantation workers. The access road to the parcel is the old Waiakea Consolidated Railroad right-of-way.

Built in the early 20th century, the railroad extended from Hilo, up the slopes of Mauna Kea, to the town of Volcano. The train hauled cane to Olaa Sugar's Waiakea Mill, located just outside Hilo, for processing and later for passengers up to Kilauea Volcano. The railroad closed in 1948, Ola'a Sugar became Puna Sugar Company, Ltd., in 1960. In 1956, the State condemned three acres originally belonging to the W.H. Shipman Company and the RC was constructed.

D.1.2 Previous Studies

Previous archaeological work consists of pedestrian surveys and historic background research conducted for the Keaau and Pahoia bypasses, which have since been constructed. A reconnaissance-survey of the parcel in 1985 resulted in an extension of the access road along the old railroad right of way (ROW) to the north, allowing access to the back of the property. A historic cemetery is located on the flat above the swale between the railroad ROW and the edge of the swale. The cemetery dates to the 1880-1890's, and likely contains the remains of Chinese workers from the 8 ½ Mile workers camp for the Olaa Sugar Company that had been located along the railroad right of way north of the facility. It has been alleged that the HIARNG encountered human remains when the parcel was re-fenced and the parking lot extended in 1986 (Chee, 1998). According to this source, family members received exhumed remains, and the remainders of the graves were moved. The cemetery currently contains approximately 50+ gravesites. The cemetery was not relocated during the current study and does not appear to be within the installation boundary. The 11,893 square foot RC, built in 1957 during the Cold War Era.

The RC and four associated outbuildings were assessed for NRHP eligibility in 2009 by E²M. The survey found that the RC was determined to be of statewide significance due to its association as one of four one-unit armories constructed in Hawaii between 1957 and 1961. Four National Guard facilities were constructed to maintain military readiness, associated with the Cold War, and domestic disaster response. The RC was constructed as part of the Federal RC Construction Program. The plans for construction were altered by the Army Corps of Engineers to accommodate Hawaii's climate. The survey found that the RC retained high levels of integrity of materials, workmanship, location, setting, feeling, and association and was determined eligible for listing on the NRHP under Criterion A and C.

A storage building (Building 004) was also evaluated during the survey due to some confusion about the construction date. The scope of work and previous ICRMP both indicated that the wood frame structure was built concurrently with the RC. After interviews with personnel previously stationed at the RC, it was determined that the building was most likely constructed between 1977 and 1985. The building lacks significant age and was determined ineligible for inclusion on the NRHP.

The 2009 survey also conducted a cultural landscape assessment of the Keaau RC, concentrating on the terraced hillside. The semi-circular terrace was cut into the northeast hill during construction of the RC in 1957. During an interview with former personnel, the unit constructed a stone wall in an attempt to prevent erosion. E²M determined that the terracing behind the RC is part of the area's landscape evolution and is significant for its association with construction of the NRHP-eligible RC.

Table D-2. Previous studies at Keaau.

Authors	Date	Title
Hunt, Terry	1993	Archaeological Assessment of Shipman Lands in Keaau Puna, Island of Hawaii
Chee, Will	1998	Hawaii Army National Guard Cultural Resources Management Plan
engineering-environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation of Ten Facilities Hawaii Army National Guard

D.1.3 Description of Cultural Resources

Building 001 The Keaau RC was designed in 1957 by the Department of Public Works, Territory of Hawai'i and built by Ichiji Matsumura (E²M 2009). The RC is a steel frame, hollow tile block structure with a large open area under a medium pitch gable roof. The RC is one of three one-unit armories built in 1957. The other two were constructed at Olaa (now Kapaa), Kauai and Kahului, Maui, and used the same architectural plans as the Kapaa RC. The primary façade is a recessed porch entrance with a simple parapet above. According to the 2009 survey, archaeological sites recorded on nearby lands are associated with early historic sugarcane field clearing activities. No prehistoric archaeological sites are located on the property or in the immediate area.



D.1.4 Cultural Resources Summary

- There are 3 acres at this site, of which 0 acres have been surveyed for archaeological resources.
- 2 buildings and structures have been evaluated for listing in the NRHP. 1 building has been determined to be eligible. No buildings need further evaluation to make determination of eligibility for listing in the NRHP.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This site has been surveyed to determine whether it includes a historic district/cultural landscape. The entire parcel is recommended as eligible as a cultural landscape. Refer to the 2009 Historic Building Survey for more information.
- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.
- This site contains no cemeteries, although a historic Chinese cemetery has been reported near the old railway right of way, north of the Keaau RC, on the hill behind the RC and outside the fence line.

D.1.5 2016-2021 Management Actions

Table D-3. Cultural Resources Management Projects at Keaau for FY 2016-2021.

Project #	Description	Status
	Contract an archaeological survey to determine the presence or absence of cultural resources at Keaau.	
	Develop an external stakeholder consultation contact list, including preferred contact method, POC, and what undertaking they would like to be contacted about.	
	Consult with SHPD, NHOs, and external stakeholders under HRS Chapter 6E for any ground disturbing activities and/or historic building modifications or demolition. Following SOPs and best management practices for inadvertent discoveries.	

D.2 Kealakekua RC (15A60), Hawaii

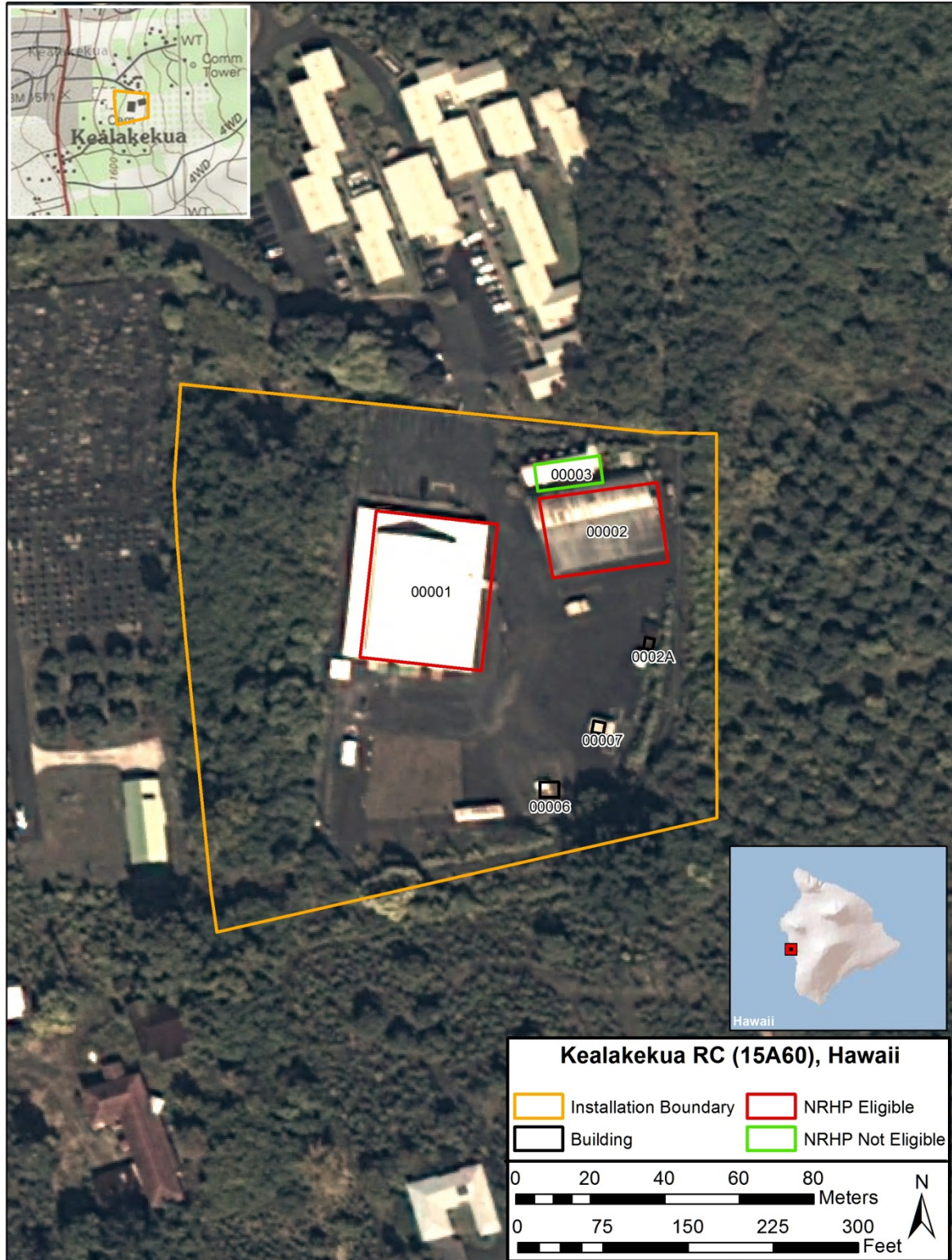


Figure D-3. Kealakekua RC Cultural Resources.

District: South Kona **County:** Hawaii **Town/Area:** Kealahou

Pride Installation Code: 15A60

TMK #: 8-1-005: 056

Support: Federal & State

Total Acreage: 4.25 acres

D.2.1 Description and Background



The Kealahou RC is located in the town of Kealahou on the western side of the island of Hawaii. The RC was constructed in 1961 and occupies a 4.25-acre parcel located in a heavily developed residential area, once used for dry land agriculture. The facility consists of a one-unit RC (Bldg 1), a Motor Vehicle Storage Quonset hut (Bldg 2), a RC Kitchen Quonset Hut (Bldg 3), a FMS shed (000A2), a HAZMAT Building (bldg. 7) and a land vehicle fueling tank (Bldg 6) on the four-acre parcel acquired from the Old Kona Hospital in 1948. The facility lies on a man-made terrace cut into the slope of the lava hillside. The RC occupies the western portion of the parcel, with other buildings, and the sheds grouped together on the eastern side of the parcel. The facility is paved and fenced.

Well known as the landing place of Captain James Cook during his second voyage, Kealahou Bay is where Cook lost his life. The town of Kealahou lies within the boundary of the Kona

Field System. This system is a native Hawaiian integrated complex of dry land agriculture with related habitation areas. The system extends three miles from the mountains to the shore, and eighteen miles in width. It consists of a patterned network of elongated rectangular fields lying parallel to the ocean. In use until the mid-19th century, the system fell into disuse after reorganization of land ownership during the Great Mahele of 1848. Development of the town has destroyed much of this system.

D.2.2 Previous Studies

The RC and two Quonset huts were assessed for NRHP eligibility in 2009 by E²M. Upon further investigation, E²M mistakenly labeled the awning of the MVS Quonset Hut (Bldg 2) as a Vehicle Storage Shed (Bldg. 4). The awning of Building 2 is captured in PRIDE as Bldg 2, therefore Building 4 does not exist and was not demolished. The Kealahou RC was constructed in 1961 using a modified plan based off the 157 standardized plan used elsewhere in Hawaii. While the form and floor plan remained the same, the aesthetics of the façade changed to match new design esthetics of the early 1960s. The one-unit RC was constructed to military readiness, associated with the Cold War, and domestic disaster response. The earlier plans that the RC is modified from were used as part of the Federal RC Construction Program. The original plans for construction were altered by the Army Corps of Engineers to accommodate Hawaii's climate. The survey found that the RC has undergone very little alteration and has retained high levels of integrity of materials, workmanship, location, setting, feeling, and association. The RC was determined eligible for listing on the NRHP for statewide significance under Criterion A and C.

The survey also evaluated two Quonset Huts (Buildings 002 and 003). The Quonset huts predate the RC and were constructed in 1948 at KMR before being moved to their current location in 1949. Building 002 serves as a vehicle maintenance shop with an attached awning used as a vehicle storage shed. The buildings were once associated with the formation of Battery A and C National Guard units stationed at Kealakekua. Building 002 was repurposed in recent years as office spaces, however; only the interior of the building has been significantly altered. The awning of Building 2 continues to be used for storage and remains unaltered. Building 003 is the former Kona Readiness Kitchen, and the smaller of the two Quonsets. The building was substantially altered, which has impacted its historic integrity. Building 002 was determined NRHP-eligible for local significance under Criterion A and C.

A cultural landscape study was also performed at the RC (E²M 2009). The survey found that the landscape was similar to that at Keaau in that each site was terraced to provide a flat construction area. Terracing around the Kealakekua RC parcel was required to level the site and became part of the areas early construction. The rocky hillside also contains a low stone retaining wall that wraps around the northeast of the parcel, behind the Quonset huts, leading to a gentle sloping area to the southeast. The RC also contains a garden feature with integrated planter boxes that are similar to one-unit armories built in 1957. Additional gardens and plantings are present however; the survey could not conclusively date the features. Since Buildings 001 and 002 are eligible for listing on the NRHP, the landscape is also significant. However, alterations to the original landscape could take away from the historic integrity and it was recommended that “further research is needed to determine the installation date and original form of the garden north of the Quonset huts” (E²M 2009).

There are no archaeological surveys of the parcel conducted prior to acquisition of the property. Archaeological studies on several parcels in the immediate area around the facility have identified features related to the Kona Field System.

D.2.3 Description of Cultural Resources

Building 001- The Kealakekua RC was built in 1961 using slightly altered plans from the 1957 standardized plans. The RC is of hollow tile and steel beam construction on a concrete slab. The steel beam structure supports a flat roof and overhanging eaves. The central drill area rises to two-and-a-half stories with a steep-pitch room. The front gable has a vertical vent with decorative quoins. The main difference between the 1957 original design and the 1961 RC is the front façade and entrance. The recessed porch with small parapet was replaced with an entrance portico. The façade consist of Roman bricks under the portico. The rear wall has three



openings with cantilevered concrete awnings, including a roll-up garage door centered under the gable. Security grates cover the hopper windows. The building was recommended as eligible for listing on the NRHP for state significance under Criterion A and C.

Building 002- The vehicle maintenance shop building is one of two Quonset huts related to this site in 1949 and has an attached covered area for vehicle maintenance. The structure is the larger of the two that were relocated from KMR and is approximately 4000 sq feet. The structure is supported by wood posts on a

raised concrete slab with a metal truss shed roof. The building was recommended as eligible for listing on the NRHP for state significance under Criterion A.

Building 003- The Readiness Center Kitchen is built adjacent to the vehicle maintenance shop (Building 002). The building was erected on a concrete slab foundation and consists of a metal frame with corrugated metal siding. The north (primary) and south facades have double sliding garage bay doors flanked by two paired windows. The north façade contains six wood framed jalousie windows while the south side contains eight 3-over-3 hopper windows. The building has alterations that have impacted its historic integrity of design, materials, workmanship and feeling. It was evaluated as not eligible for listing on the NRHP.



There are no known archaeological resources at this facility. Any remnants of the *Kona Field System* that may have been present on the parcel are gone, destroyed by construction of the Old Kona Hospital and Kealahkekua town.

D.2.4 Cultural Resources Summary

- There are 4.25 acres at this site, of which 0 acres have been surveyed for archaeological resources.
- Of the 6 buildings and structures at this site, 3 are currently 50 years old or older.
- 3 buildings and structures have been evaluated for listing in the NRHP. 2 buildings have been determined to be eligible. No buildings need further evaluation to make determination of eligibility for listing in the NRHP.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This site has been surveyed to determine whether it includes a historic district / historic landscape. Additional research is needed to determine the installation date and original form of the garden north of the Quonset huts.
- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.2.5 2016-2021 Management Actions

Table D-4. Cultural Resources Management Projects at Kealahou RC for FY 2016-2021.

Project #	Description	Status
	Contract an archaeological survey to determine the presence or absence of cultural resources at Kealahou.	
	Develop an external stakeholder consultation contact list, including preferred contact method, POC, and what undertaking they would like to be contacted about.	
	Consult with SHPD, NHOs, and external stakeholders for any ground disturbing activities and/or historic building modifications or demolition. Following SOPs and best management practices for inadvertent discoveries.	

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D.3 Keaukaha Military Reservation (15A10), Hawaii

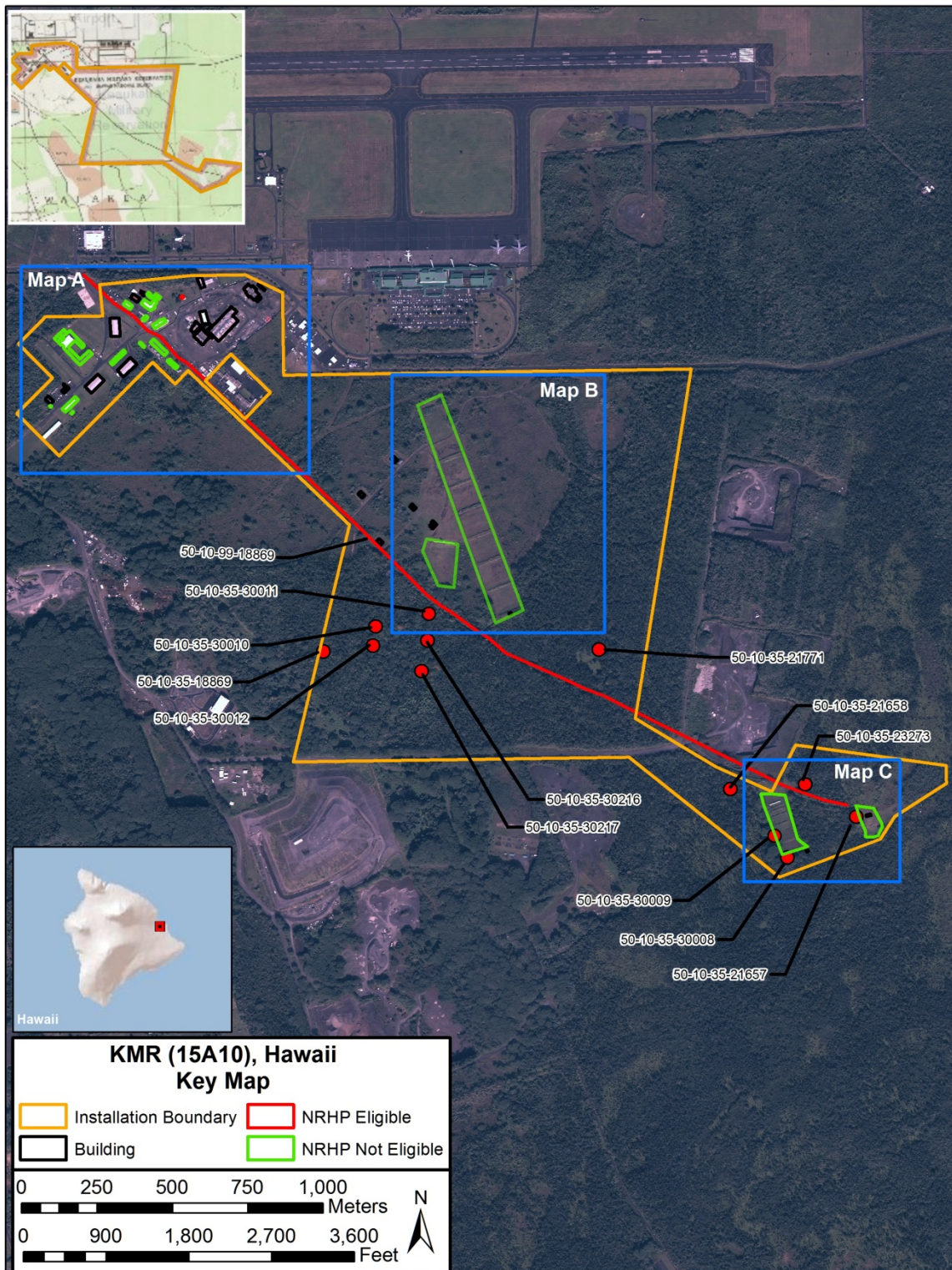


Figure D-4. KMR Cultural Resources.

District: Hilo **County:** Hawaii **Town/Area:** Hilo
PRIDE Installation Code: 15A10
TMK #: 2-1-012: 003 and 2-1-013: 010 (Hawaii Army Guard)
Support: Federal & State
Total Acreage: 509 acres

D.3.1 Description and Background

KMR is located on 509 acres west of Lyman Field, on the former Hilo Naval Air Station. The area sits atop *pahoehoe* and *a'a* lava fields and has been developed around the airfield. The area is classified as very rocky but much of the developed area has been graded to level lawn or paved. The undeveloped portions of KMR still consist of *pahoehoe* and *a'a* lava fields as well as dense unmodified forests. Currently there are 42 extant structures and pads at KMR. KMR has a five-unit RC constructed in 1953 and expanded in 1963.



In 1848, King Kamehameha III enacted the law of *Divisions of Lands between the King, the Government, the Chiefs, and the People*, known as the “The Great Mahele.” Before the Great Mahele, all property belonged to the ruling class. The Great Mahele represents a change from pre-Euro-American Hawaiian land ownership within traditional land units known as ahupuaa, to a system of ownership based on claims of those living on and working the property. Nevertheless, the Crown retained large tracts of property. KMR lies on lands formerly deeded to the Crown of Hawaii.



In 1914, the Territory of Hawaii set land aside for a National Guard rifle range. The 1000 yard Known Distance (KD) range is the first structure built at KMR. Later, KMR added the small arms range and a carbine range. A section of the *Historic Puna Trail* bisects the property. The Puna Trail is part of a system of foot trails, or *ala loa*, constructed in the prehistoric period that circles the island.

Development of the base also included widening of the historic Puna Trail. In 1925, land was withdrawn from the HIARNG for construction by the Army Corp of Engineers (ACOE) for General Lyman Airfield, also known as Hilo International Airport. The ACOE expanded the airfield in the late 1930's, aided by prison labor from a camp built at KMR in 1938. In 1941, the airfield expanded south of Lyman Field. In 1943, General Lyman Field and KMR became part of Hilo Naval Air Station, and extensive military infrastructure and housing was constructed. Navy occupation of KMR peaked in 1945 at 4,500 personnel. In 1945, the Navy cleared all facilities from the runways and decommissioned the base. The Army Air Corp began operations at Lyman Field in 1947.

Reactivated on the island of Hawaii, the HIARNG shared facilities with the Army Air Corp at KMR. By 1953, KMR housed 11 HIARNG units. In 1960, the addition of an RC at KMR allowed the HIARNG to move permanently from Shipman Street in Hilo, and the HIARNG turned the old RC over to the state. The majority of the buildings built during the Navy and Army Corps of Engineers occupation of the base have been removed or torn down. Prior to the HIARNG takeover, most of the buildings were sold, moved to other DoD and HIARNG facilities, or demolished.

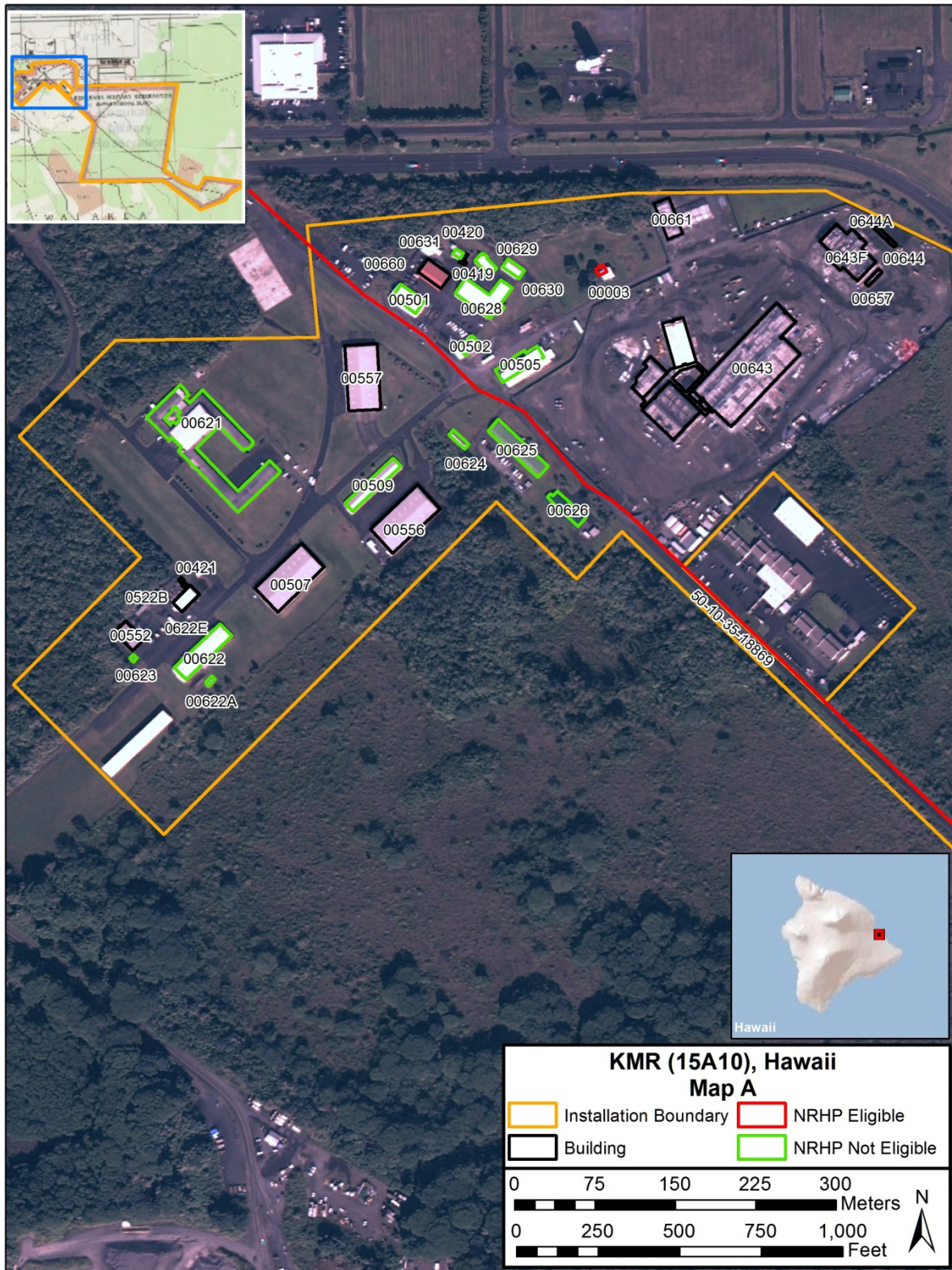


Figure D-5. KMR Cultural Resources, Map A.

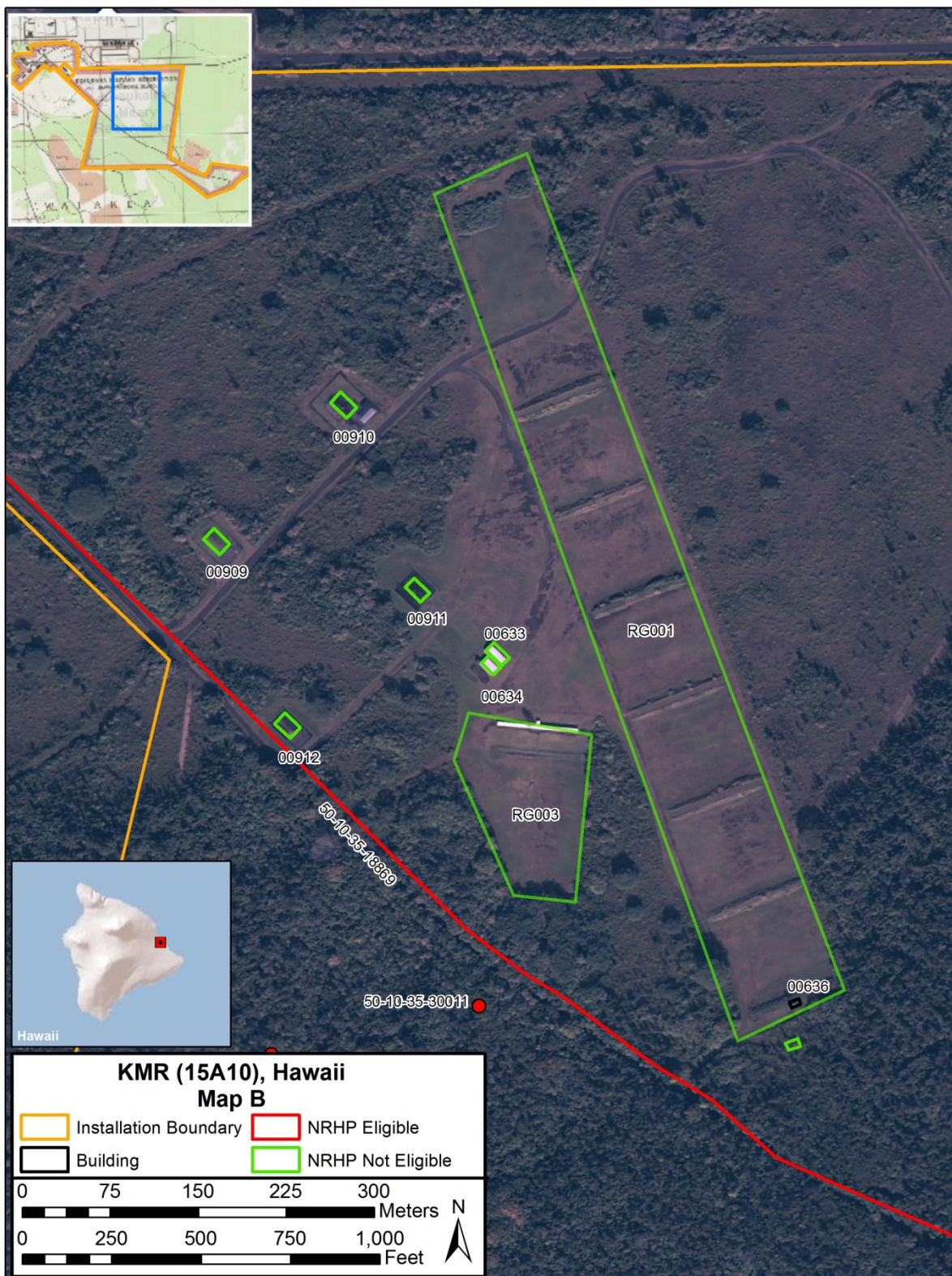


Figure D-6. KMR Cultural Resources, Map B.

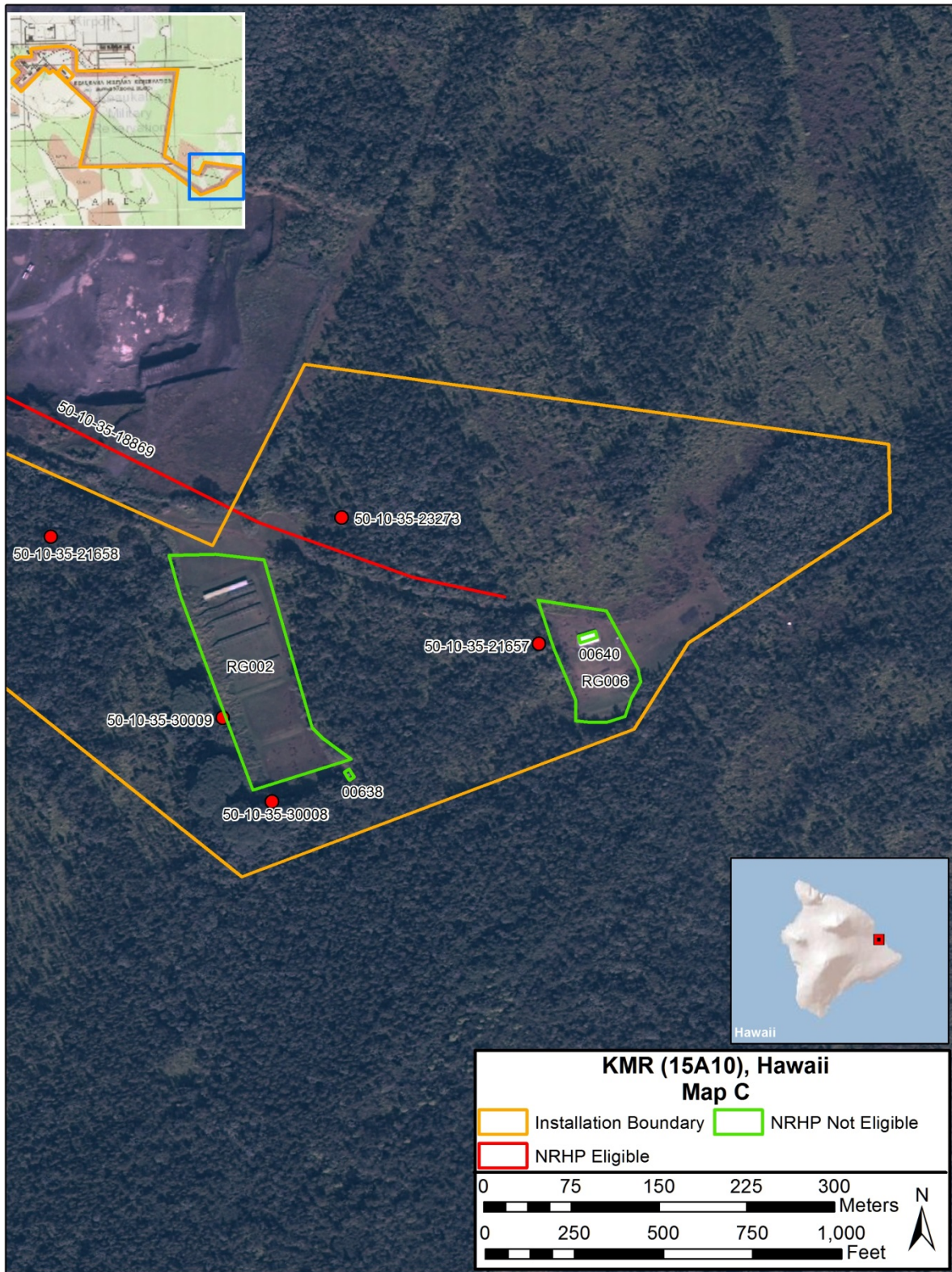


Figure D-7. KMR Cultural Resources, Map C.

D.3.2 Previous Studies

Approximately 100 percent of KMR has undergone inventory level surveys. This includes a 100 meter corridor adjacent to either side of the Puna Trail, the built areas, and transects into undeveloped portions off of the Puna Trail. Archaeologists have failed to locate a lava tube sighted from the air.

A reconnaissance survey was completed by Devereux et al. (1997) of a 100 m corridor adjacent to the section of the Puna Trail recorded two sites, a military gun emplacement constructed with lava block in a C-shape (historic resource) and a modified lava outcrop (pre-historic resource). The C-Shaped enclosure was located east of Building 639 along the route of the old Puna Trail. The enclosure was found to be part of a military gun emplacement (Site 50-10-35-21657). A second site was noted during the survey but later determined to be a bulldozer push pile. The survey also recorded and addressed 10 historic structures over 50 years of age. The survey found that the buildings were not eligible for listing on the NRHP.

A Phase II inventory level survey was completed by Hammatt and Bush in 1999. The survey took place along the same corridor as the previous Phase I. Hammatt and Bush located two additional sites to the previous survey completed by Devereaux et al. State site 50-10-35-21658 was located 7 meters from the Puna Trail. The site is a complex of five stacked-stone mound built on a collapsed lava tube. Features A-C were incorporated into the lava tube and may have marked a source for or collected water. State Site 50-10-35-21659 was recorded as a lava depression with stacked walls, 3-4 courses high. The site was thought to be too small for habitation and may have been suited for agricultural purposes. Site 50-10-99-18869/12273 (Puna Trail) was rerecorded as part of this survey. The survey found that the four sites recorded in both the Phase I and Phase II archaeological surveys were eligible for listing on the NRHP under Criterion D. The prehistoric trail was also recommended under Criterion A.

Identification of Site 50-10-35-21771 occurred during an undated natural resources survey (Tolleson 2001) in an area that had yet to be surveyed for archaeological resources. In 2001, Tolleson conducted a reconnaissance survey and data recovery of the site. The pedestrian survey located four features. Features 2 and 3 were selected for subsurface testing. Units produced sherds from a Chinese container, friable metal, and several historic bottles. The bottles dated between 1880 and 1904. Ground surface recovery included horseshoes, metal tools, and a grinding wheel. The site was thought to be part of a repair location along the road that may have also been used to hold up during rains or used for social gatherings. The site was recorded and recommended as eligible for listing under Criterion A, C, and D.

The southwest portion of KMR, between the Puna Trail and western fence line, was intensively surveyed by Escott and Tolleson (2002) to determine the boundaries of Site 50-10-35-23273. The survey found that the Site 23273 covered an area 103 meters by 146 meters and contained three features. Feature 1 was a remnant trail while Features 2 and 3 were two agricultural features.

Wheeler et al. (2014) conducted an inventory level survey within the vegetated areas of KMR in support of planning for long-range improvements. The pedestrian relocated five sites and located five additional sites. Site 50-10-35-18869 is the Hilo District portion of the Puna Trail, modified in the late nineteenth century. The historic property was evaluated by Hammatt and Bush (2000) and considered significant under NHRP Criteria A and D. Wheeler et al. (2014) reevaluated this section of the trail. While the trail has been disturbed, the 2014 survey found that the site is still eligible as a historic property under NRHP Criteria A and C. Two sites, Site 50-10-35-21657 and Site 50-10-35-21568 were reevaluated as part of this Phase I survey. The sites were previously identified by Hammatt and Bush

(2000). Site 50-10-35-21567 is part of a historic artillery position while Site 50-10-35-21568 represented trail markers along the Puna Trail. Both sites were considered significant under NRHP Criteria D. Wheeler et al. 2014 reevaluated the sites and concurred with the previous assessment.

Site 50-10-35-21771 was previously located by Tolleson (2001). The site was considered to be part of a late nineteenth century complex located adjacent to the paved portion of the Puna Trail. The four previously identified features were evaluated as significant for their association with broad patterns of history, period, and construction methods. The site was determined eligible for listing on the NRHP under Criteria A, C, and D. Wheeler et al. 2014 reevaluated the site and supported the previous determination.

Site 50-10-35-23273 is a historic era complex consisting of a remnant trail (Feature 1) and two agricultural planting areas. The site was previously recorded by Escott and Tolleson (2002). Escott and Tolleson determined that Feature 1 was significant under NRHP Criterion D however, Features 2 and 3 (agricultural plantings) lacked potential to yield information for research. Wheeler et al. (2014) supported this determination and also found Feature 1 to be significant under NRHP Criterion D.

Wheeler et al. 2014 located five new sites (Site 50-10-35-30008, -30009, -30010, -30011, -30012) within the heavily vegetated areas on KMR. Site 50-10-35-30008 and Site 50-10-35-30009 were found to be temporary habitation sites used in the pre-contact and historic periods. Site 50-10-35-30008 consists of a lava tube off the Puna trail. Site 50-10-35-30009 consisted of three features on a natural basalt outcropping which may have also been used as an agricultural site. Site 50-10-35-30010 was identified as a late nineteenth century habitation site consisting of five features. The site is located on a filled area between two natural depressions. The site was determined to be used as a temporary habitation site. Site 50-10-35-3011 is also a late nineteenth century complex consisting of a stacked rock wall and circular depression. The function of the site is in determinant. Site 50-10-35-30012 was identified as an isolated portion Site 50-10-35-23273 used for pre-contact and historic transportation. All sites located by Wheeler et al. (2014) were determined to be historically significant under NRHP Criterion D.

HDR, Inc. conducted a historic building survey and NRHP evaluation at five HIARNG installations. HDR surveyed 27 facilities, 45 years and older at Kekaha WETS and Hanapepe RC on Kauai, Ft. Ruger, and Waiawa Gulch UTES & RTSM on Oahu, and KMR on Hawaii. Fieldwork was completed in March 2014 and following consultation with SHPD, the final report was completed in December 2014. Fourteen facilities were surveyed (00631, 00633, 00634, 00636, 00638, 00640, 00909, 00910, 00911, 00912, RG001, RG002, RG003, and RG006) and none were recommended as eligible for the NRHP (Blackwell and Barnes 2014).

There are 30 buildings 50 years or older at KMR. The HIARNG received these buildings in 1946, upon abandonment by the Navy. A Historic Building Survey was conducted in 2006 and 2014 of all buildings at KMR older than 50 years of age. The SHPD determined that building 003 was eligible for inclusion to the NRHP in 2007.

Table D-5. Previous studies at KMR.

Authors	Date	Title
Devereux et al.	1997	Archaeological Reconnaissance Survey of Keaukaha Military Reservation South Hilo District Hawai'i Island (Hawai'i National Guard) 503.6-acre parcel, TMK: 2-1-12:3 and 2-1-13:10.
Hammatt, Hallett and Anthony Bush	2000	Archaeological Inventory Survey of Selected Portions of the Hawaii Army National Guard 503.6-acre Keaukaha Military Reservation Waiakea Ahupuaa, South Hilo District, Hawaii Island, TMK: 2-1-12:3 and 2-1-13:10.
Tolleson, Wendy	2001	From Trail to Road: A Late Historic Way Station on the Puna Trail on the Hawaii Army National Guard Keaukaha Military Reservation, Hilo, Hawaii Island, TMK: 2-1-12:3 and 2-1-13:10.
Escott, Glenn and Wendy Tolleson	2002	Archaeological Inventory Survey at Keaukaha Military Reservation, South Hilo District, Island of Hawaii, TMK: 2-1-12:3 and 2-1-13:10.
AMEC	2006	A Historic Building Survey for KMR, Hilo Hawaii.
HABS No. HI-540	2009	Building 003 (Nurses Cottage) Keaukaha Military Reservation Hilo Vicinity, Hawaii County, Hawaii.
Blackwell and Barnes	2014	Final Historic Building Survey and Evaluation Report at Five Facilities Hawaii Army National Guard.
Wheeler et al.	2014	Draft Archaeological Inventory Survey, Phase I, Keaukaha Military Reservation (KMR) Hawaii Army National Guard Facility Waiākea Ahupuaa, South Hilo District, Island of Hawaii TMKs: [3] 2-1-012:003, 131 and [3] 2-1-013:010.

D.3.3 Description of Cultural Resources

Historic background research and previous reconnaissance and inventory survey results reveal that the land surrounding KMR is extremely rugged such that the likelihood of permanent settlements occurring during the prehistoric period is low. However, prehistoric properties have been identified on KMR, and are listed below:

State site 50-10-35-18869 (The Puna Trail) - An ala loa, or ancient foot trail, is one of a series of foot trails that encircle the island of Hawaii. This trail, the largest of the prehistoric properties on the base, became a government road in the 1880's before becoming the main road through the facility. Due to major modifications and realignment, this portion of the trail was determined not eligible for the NRHP. No further work recommendation accepted by the SHPD.

State Site 50-10-35-21657 - is a C-Shaped stacked stone enclosure built against the south edge of a *pahoehoe* flow. The enclosure is constructed of roughly stacked boulders and cobbles. Due to the lack of prehistoric artifacts and its



crude construction, the site is likely associated with a military artillery position (Hammatt and Bush 2000). The site is considered significant under NRHP Criterion D. **No further work** recommendation accepted by the SHPD.

State Site 50-10-35-21658 (Series of Five Rock Cairns or “Ahu”) - A small site, consisting of a series of five rock cairns or *ahu*, which may be related to the Puna Trail. The site is considered significant under NRHP Criterion D. **Preservation by avoidance** recommendation accepted by SHPD.

State site 50-10-35-21771 - The site is a historic complex consisting of a low platform, enclosure, possible *imu*, and a meadow thought to be used by road workers as a short term layover location for shelter, to store equipment, or have after work parties. Artifacts supporting this include, hand tools, a grinding wheel, liquor bottles, a metal pot and Chinese ceramic container. The site is related to the earliest phases of historic road construction. Site 50-10-35-21771 was recommended eligible for listing on the NRHP under Criterion A, C, and D. **Preservation by avoidance** recommendation accepted by SHPD.



Archaeological Collection from site 50-10-21771 - A collection of artifacts recovered from site 50-10-21771 are stored in Bldg. 628. Recommend statewide management action for curation and interpretation of HIARNG collections to ensure HIARNG compliance with 36 CFR 79 and AR 870-5.

State site 50-10-35-23273 - The site contains three features, including a remnant portion of the trail and two planting features. Feature 1 is the trail remnant consisting of unimproved ground with a slight depression. Feature 2 is a rectangular planting feature located on a level basalt cobble outcrop. Feature 3 is a circular planting feature along the southeastern edge of the rugged lava flow. Two kukui nut shells were located within the feature. Feature 1, the Puna Trail, remnant is significant under NRHP Criterion D. **No further work** recommendation accepted by the SHPD.

State site 50-10-35-30008 - The site consists of a modified lava tube in an uneven *pahoehoe* flow and dense vegetation. A triangular stacked stone terrace is located just inside the northern opening. Based on the proximity to the Puna Trail and marine shell midden, the site was likely a recurrent temporary shelter used in pre-contact and historic times. The site and its associated features are significant under NRHP Criterion D. **No further work** recommendation accepted by the SHPD.

State site 50-10-35-30009 - This site represents a pre-contact and historic complex consisting of three features along just off the Puna Trail. Feature 1 is a modified outcrop including a low-lying rock wall and a curved alignment of loosely stack cobbles. Feature 2 is a lava tube paved with basalt cobbles. Feature 3 is a lava tube along the southern edge of the outcrop with two small openings to the west and east. The tube is also paved with basalt cobbles. The site was likely a temporary pre-contact/historic habitation site. The site may have been previously impacted by military training and construction of KD Range #2. Despite this, the site and its associated features retain integrity of location, design, setting, workmanship, and feeling and are significant under NRHP Criterion D. **No further work** recommendation accepted by the SHPD.

State site 50-10-35-30010 - The site represents late nineteenth century construction along the Puna trail and is comprised of five features. Feature A is a roughly rectangular-shaped leveled area between two

natural depressions. The feature may have been part of a previously existing structure. Several historic artifacts were located in the cleared area. Feature B is a deflated rock mound, northeast of the Feature A retaining wall. Feature C is a rectangular enclosure constructed of two to four courses of neatly stacked and faced basalt cobbles. The feature may have been used as a pen for livestock. Feature D is a circular stone-line pit, possibly used as a privy, within a natural depression. Feature E is a small stone mound within a natural depression constructed from loosely stacked cobbles. The site and its associated features are significant under NRHP Criterion D. **No further work** recommendation accepted by the SHPD.

State site 50-10-35-30011 - The site represents a late nineteenth century complex consisting of two features. Feature A is a linear rock wall constructed of basalt boulders and cobble stacked three to four courses high. Feature B is a constructed pit lined with three courses of basalt cobbles. The function of the features is indeterminate, however; the site and its associated features retain integrity of location, design, setting, workmanship, and feeling and are significant under NRHP Criterion D. **No further work** recommendation accepted by the SHPD.

State site 50-10-35-30012 - The site is a trail remnant located in a densely vegetated area. The edge of the trail is lined with basalt curbstones. The site is possibly an isolated remnant of SIHP #-23273. The site was modified historically but likely functioned as a pre-contact transportation route. The site is significant under NRHP Criterion D. **No further work** recommendation accepted by the SHPD.

State site 50-10-35-30038 – A 70 ft. long remnant portion of the pre-historic Puna Trail, parallel to the modern Jeep Trail running through KMR, adjacent to KD Range #2. The fairly level surface of the trail is comprised of compressed and worn basalt cobbles. The sides of the trail are defined in places by alignments of neatly placed basalt cobble curbstones. **Preservation by avoidance** recommendation accepted by SHPD.

State site 50-10-35-30216 – This site is comprised of a 23 ft. long terraced wall, possibly used as an activity center or temporary habitation area. Considered eligible under Criterion D of the National Register. **No further work** recommendation accepted by the SHPD.

State site 50-10-35-30217 – This site is comprised of a low rock wall and mound, possibly used for Hawaiian agricultural practices. Considered eligible under Criterion D of the National Register. **No further work** recommendation accepted by the SHPD.



Building 003 – Former Nurses Cottage - Building 0003 was constructed in 1950 and is a one-story elevated structure build in a Plantation Cottage style. Building 003 was originally a nurse's cottage as part of the former naval facility. The structure has an open foundation covered with wooden slats, wood siding and a hipped roof with open gables covered in corrugated metal. The front façade faces southeast. The structure has two double hung windows and a double wood door entry accessed by a wooden front porch. The front porch has gable roof extension. The west elevation has one double

hung window. The rear elevation has two double hung window and two single wood door entries. The back doors are accessible from a wooden back porch, which is covered by the overhanging eaves. There is a small carport extension off the rear of the structure supported by wood poles. The east elevation

has three double hung windows, two of which are set. The structure's interior has been renovated and updated with a more modern kitchen and restroom. The structure is in fair to good condition.



47 mm Cannons - There are two trophy 47mm Japanese Model 1 (1941) antitank guns weighing 1,600 pounds each. Designed for towing behind a jeep, the cannons are mounted on split-rail trailers with tires and a shield. Each cannon has a semi-automatic, horizontal sliding wedge breech mechanism with a muzzle velocity of 2,700 feet per second. These cannons fired armor piercing shells that could penetrate two-inch armor plating at 500 yards. Produced at the Osaka Army Arsenal, the Model 1 refers to the date of the adoption of this model by the military (1941 or 2601 on the Japanese calendar). Recommend statewide management action for curation and interpretation of HIARNG collections to ensure HIARNG compliance with 36 CFR 79 and AR 870-5.

The HIARNG obtained the cannons in the 1960's when the military distributed captured armaments to any service who wished to have them, and are located at the front of the RC. The area where KMR is located has some of the highest rainfall totals in the state, and the dampness has caused extensive rust damage to both cannons.

KMR Archaeological Monitoring Plan

Cultural Surveys Hawaii conducted an Archaeological Inventory Survey of the KMR parcel in 2014. As part of the AIS an Archaeological Monitoring Plan was prepared and approved by the Hawaii SHPD. The plan states that the HIARNG will consult with SHPD on any ground disturbing activities and will hire an on-site archaeological monitor for any ground disturbance in unmaintained areas (see Figure D-9) to facilitate the identification and treatment of any burials that might be discovered during project construction, and to alleviate the project's effect on non-burial archaeological deposits. Archaeological monitoring is not recommended for any ground disturbance within the presently maintained grounds, including the existing ranges.

Under Hawaii State historic preservation legislation, "Monitoring shall entail the archaeological observation of, and possible intervention with, on-going activities, which may adversely affect historic properties" (HAR 13-279-3). The monitoring plan includes eight sections: Anticipated historic properties, locations of historic properties, fieldwork, archaeologist's role, coordination meeting, laboratory work, report preparation and curation. The archaeological monitoring firm contracted will need to be permitted to conduct archaeological studies in the State of Hawaii and compliant with any federal regulations governing archaeological monitoring. The HIARNG Environmental Office can fund an archaeological monitor from STEP Project #HIONG140005 (Historic Property Monitoring) for HIARNG Installations with an AMP or lacking sufficient archaeological survey information. The HIARNG ENV Office will only be able to fund archaeological monitoring if the proponent consults early with the ENV Office to coordinate the contract and if the ENV Office receives adequate funding for the monitoring projects.

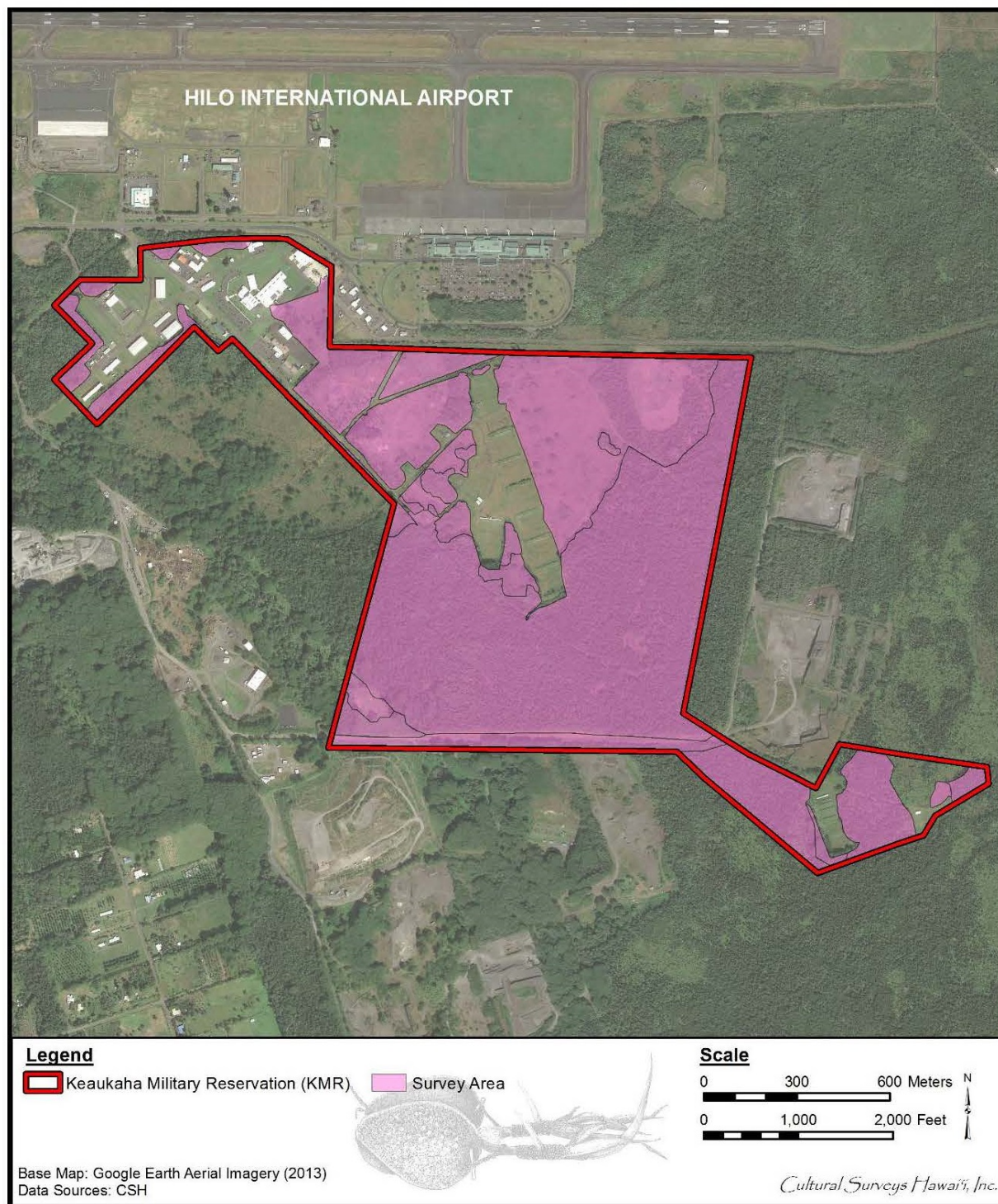


Figure D-8. Survey area map showing locations at KMR requiring on-site archaeological monitoring of ground disturbing activities (Cultural Surveys Hawaii 2014).

D.3.4 Cultural Resources Summary

- An Archaeological Monitoring Plan has been developed as part of the 2014 Archaeological Inventory Survey of KMR by Cultural Surveys Hawaii, which will be referenced with all Section 106 consultations letters.
- There are 509 acres at KMR, of which 509 acres has been surveyed for archaeological resources. 13 archaeological sites have been located on KMR, of which 13 are recommended eligible for the NRHP.
- 10 of the sites were recommended for “no further work” during the AIS Phase I and Phase II surveys by Cultural Surveys Hawaii. SHPD concurred with both reports in 2014. No further work means all information has been gained from the site and it does not exhibit qualities that would make it desirable for preservation. Because of this determination, an undertaking can proceed with impacting (including full destruction of) a site if deemed necessary.
- 29 buildings and structures have been evaluated at KMR. One has been determined to be eligible for listing in the NRHP.
- No buildings and structures at KMR will turn 50 years old over the life of this ICRMP.
- No historic districts or historic landscapes are present at KMR.
- There are no known resources of traditional, religious, or cultural significance that might be part of a larger cultural landscape.

D.3.5 2016-2021 Management Actions

Table D-6. Cultural Resources Management Projects at KMR for FY 2016-2021.

Project #	Description	Status
	Develop interpretive signage for environmental awareness and identify cultural resources found at KMR.	
	Extend fencing around State Site 50-10-35-21771 include features; excavate and curate grinding wheel only if further archaeological testing is done at 50-10-35-21771, in the area of the grinding wheel	
	Statewide management action for curation and interpretation of HIARNG collections will include artifacts from 50-10-35-21771, and any collections from current archaeological survey	
	Display artifacts in the lobby of Bldg. 643A and the facility meet 36 CFR 79 requirements	
	Consult with SHPD, NHOs, and stakeholders on proposed undertakings altering historic Bldg 003 and/or any ground disturbing activities at KMR. Follow SOPs for any inadvertent discoveries.	
	Develop an external stakeholder consultation contact list, including preferred contact method, POC, and what undertaking they would like to be contacted about.	

D.4 Hilo AASF #2 (15A12), Hawaii



Figure D-9. Hilo AASF #2 Cultural Resources.

District: Hilo **County:** Hawaii **Town/Area:** Hilo
Pride Installation Code: 15A12
TMK #: 2-1-012: 131 (Hawaii Air Guard)
Support: Federal & State
Total Acreage: 8

D.4.1 Description and Background

Hilo AASF #2 is located on Lyman field south of Hilo Bay and northwest of KMR. The 19.8-acre parcel sits atop a *pahoehoe* lava field. The area is classified as very rocky but has been previously graded and paved as the Hilo International Airport was developed and expanded. The National Guard acquired a small segment of land and six buildings as part of an Executive Order in 1952. The AASF was renovated and expanded in 1996 in order to support the Combat Enhanced Capability Aviation Team (CECAT) medical transport. The site consists of 8 structures including three hangars, a flammable materials storehouse, canopy, and two storage buildings.

D.4.2 Previous Studies

No archaeological or architectural history surveys have been conducted at Hilo AASF #2.

D.4.3 Description of Cultural Resources

Historic background research and previous reconnaissance and inventory survey results reveal that the land surrounding Hilo AASF #2 is extremely rugged such that the likelihood of permanent settlements occurring during the prehistoric period is low. Due to extensive grading and development the presence of cultural resources and/or historic properties is highly unlikely.

D.4.4 Cultural Resources Summary

- There are 8 acres Hilo AASF #2, of which zero acres have been surveyed for archaeological resources.
- Of the 8 buildings and structures at Hilo AASF #2, zero are currently 50 years old or older.
- No buildings and structures at Hilo AASF #2 will turn 50 years old over the life of this ICRMP.
- Hilo AASF #2 has not been surveyed to determine whether it includes a historic district or historic landscape.

Table D-7. Cultural Resources Management Projects at Hilo AASF #2 for FY 2016-2021.

Project #	Description	Status
	Consult with SHPD on any ground disturbing activities.	

D.5 Puunene RC (15B10), Maui



Figure D-10. Puunene RC Cultural Resources.

District: Kula **County:** Maui **Town/Area:** Kalaepohaku
PRIDE Installation Code: 15B10
TMK #: 3-8-08: 014
Support: Federal & State
Total Acreage: 30 acres

D.5.1 Description and Background



The Puunene RC is located along the southern portion of “neck of Maui,” 2.8 miles northwest of Kihei. The RC consists of 30 acres within the former Naval Air Station (NAS) Puunene (State Site 50-50-09-4164) located along the sandy lowlands between two high mountains. The area was used historically for commercial agriculture beginning in the 19th century. Prior to the acquisition of the former NAS Puunene Parcel, the Maui airport was constructed in the northwest section. The Navy utilized the civilian airport until the base’s closure in 1945. The airport continued to be utilized until 1955, when operations were moved

to the Kahalui. The HIARNG acquired 30 acres in 1990 along the northwestern airstrip, adjacent to Mokulele Highway. Currently, the HIARNG uses this small portion of the airstrip as an airlift and maneuver area.

The airstrip is located in a pre-contact era that was not heavily settled as cultivation would have been limited by the poor soil and lack of water. The closest settlements were along the Maalaea Bay and Kealia Pond and traditional area use was limited to trail crossings between coastal and interior areas. During the Great Mahele, the land was deeded to the governor. Upon his death, the land was deeded to HC&S and used for commercial sugar production and pasture land. As part of Executive Order 804 (Drolet and Sinoto 1998), the land was turned over to the Territory of Hawaii. With WPA funds, the Territory began constructing the Maui Airport to support interisland flights.

The U.S. Navy appropriated the land and airport to establish NAS Puunene during WWII. The Navy constructed 258 buildings that accommodated up to 3,000 people (Tuggle et al 2001). They expanded and paved the airstrip, and built infrastructure in the form of roads, water tanks, and underground and above-ground gasoline tanks. The base was the primary pilot training facility in the Pacific for the Navy, and accommodated a contingent of WAVES, an Army squadron, and an observation post. The base was placed into a caretaker status in 1946 and subsequently closed two years later. The airport continued commercial operations until 1955 when all operations were transferred to Kahalui Airport.

Master planning of the area has gone through several iterations. Portions of the former airbase have been used for commercial and recreational purposes. The area surrounding the airstrip has been used for sugarcane cultivation and livestock pasture. The airstrip was used for commercial purposes, prior to the establishment of the HIARNG RC, for a crop dusting operation and recreational purposes as a drag strip. Current use of the airbase still includes sugarcane cultivation.

D.5.2 Previous Studies

An inventory level survey of the proposed HIARNG Puunene parcel was conducted by Drolet and Sinoto in 1998 and is also referenced in the 2002 Environmental Assessment for Construction of the HIARNG Puunene Maui Consolidated Readiness Center (MCRC). The 1998 survey identified over 15 concrete foundations, a swimming pool complex, handball courts, intact bunkers and splinter shelters, as well as asphalt runways/taxiways associated with the former air station. The survey found that majority of the remains were located in the kiawe thicket along the western portion of the Puunene parcel, between Mokulele Highway and the taxiway. Due to the intensive, land-altering activities associated with development of the air station, all of the survey area was negatively impacted. All of the building superstructures from that era were demolished in 1947, and remain only as concrete foundations. The 5 splinter shelters/bunkers were recommended for detailed plan mapping by Drolet and Sinoto. In a letter dated May 29, 1999 the SHPD recommended preservation by avoidance of the bunkers and only recommended plan mapping if demolition is planned of the splinter shelters. Due to the condition of the other structures, the features are considered no longer significant for the National Register. No further archaeological work is recommended.

An archaeological inventory survey was conducted by Tomanari-Tuggle et al. in 2000. The survey evaluated NAS Puunene (State Site 50-50-09-4164), Sugar Plantation Features (50-50-09-4800), Post-War Ranching Features (50-50-09-4801), Old Kihei Railroad Bed (50-50-09-4802), and Haiku Ditch (50-50-09-4803) for NRHP eligibility. Sites 4800, 4802, and 4803 were all recommended as eligible for listing for their association with the sugar industry on Maui on the NRHP under Criterion A and D. Site 4801 however, was not eligible due to lack of age. NAS Puunene (State Site 4164) was recommended eligible for the National Register under criterion A, C and D.

The NAS Puunene project area encompassed approximately 1,875 acres, and included a total of 131 features. Features included concrete pads, runways, bridges, septic tanks, bunkers, walls, handball courts, swimming pools, revetments, railroad tracks, and gasoline storage facilities. All but seven structures (two swimming pools, two gasoline storage tanks, two transformer buildings, and one storehouse for inter materials) were recommended for long-term preservation as contributing features to site 4164. Of the 131 features recorded, only 23 of them are located on the HIARNG Puunene MCRC parcel (Drolet and Sinoto 1998). A table listing the 23 features located on HIARNG property is included in the 2002 Environmental Assessment. The 2000 report recommends a long-term preservation and treatment plan for all of the historic features.

Due to the difference in evaluations and recommendations by the two archaeological inventory surveys, the HIARNG will follow the mitigation recommendations to conduct HABS/HAER level recording on any of the splinter shelters/bunkers that may be impacted and/or demolished by an undertaking on HIARNG property.

Most of the current HIARNG facility was covered by these archaeological surveys. Only a small portion of the northern portion of the parcel has not been surveyed. The previous archaeological surveys both noted that buildings within the HIARNG parcel were previously demolished in 1947. While the RC is located within the northern portion of Site 50-50-09-4164, additional sites located in Tomanari-Tuggle 2001 are located west and southwest of the HIARNG parcel.

Table D-8. Previous Studies at Puunene.

Authors	Date	Title
Drolet and Sinoto	1998	An Archaeological Inventory Survey of the Proposed Army National Guard Planning Area, Pule Ahupuaa, Wailuku Maui (TMK 3-8-08: Por 1)
Tomanari-Tuggle et al.	2000	Fire on the Land: Archaeology, Architecture, and Oral Historic of Former Naval Air Station Puunene Pulehunui, Maui
HIARNG	2002	Final Environmental Assessment, Construction of the Hawaii Army National Guard's Maui Consolidated Readiness Center Pulehunui (Puunene), Maui, Hawaii

D.5.3 Description of Cultural Resources

Site 50-50-09-4164 - The historic remnants at Puunene have been surveyed by Drolet and Sinoto in 1998 and by Tuggle et al in 2000. The vast majority of structures at Puunene NAS were temporary structures that were demolished after the base closed. The buildings and ruins here reflect the expansion of military facilities that took place in Hawaii during WWII, along with the rapid abandonment in post-war Hawaii. NAS Puunene was listed on the State Historic Register by the SHPD under Site 50-50-09-4164.



Archaeological collection from Site 50-50-14-4740 - Stored and displayed in cases in the lobby of Bldg. 001 at Puunene RC.

D.5.4 Cultural Resources Summary

- There are 30 acres at this site, of which 26.85 acres have been surveyed for archaeological resources.
- One archaeological site has been located (50-50-09-4164). The HIARNG will conduct HABS/HAER level documentation on the 5 splinter shelters if an undertaking requires the demolition or alteration of the splinter shelters.
- Of the 3 buildings and structures at this site, 0 are currently 50 years old or older.
- No buildings and structures have been evaluated for listing in the NRHP. No buildings have been determined to be eligible. No buildings need further evaluation to make determination of eligibility for listing in the NRHP.

- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This site has not been surveyed to determine whether it includes a historic district / historic landscape.
- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.5.5 2016-2021 Management Actions

Table D-9. Cultural Resources Management Projects at Puunene for FY 2016-2021.

Project #	Description	Status
	Consult with DLNR regarding the transfer of Kanaio Artifacts back to DLNR ownership.	
	Consult with SHPD, NHOs, and external stakeholders for any ground disturbing activities and/or historic building modifications or demolition. Following SOPs and best management practices for inadvertent discoveries.	
	Develop an external stakeholder consultation contact list, including preferred contact method, POC, and what undertaking they would like to be contacted about.	
	Conduct an archaeological inventory survey to cover all 30 acres of the Puunene facility under Section 110, including re-evaluation of the 5 splinter structures. Conduct HABS/HAER of the splinter structures if there is a project that requires the demolition of the 5 splinter structures.	
	Coordinate with FMO to include NAS Puunene structures on PRIDE inventory	

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D.6 Ukumehame WETS (15A67), Maui



Figure D-11. Ukumehame WETS Cultural Resources.

District: Kealahou **County:** Maui **Town/Area:** Lahaina

PRIDE Installation Code: 15A67

TMK #: 4-8-02: 47

Support: 100% State

Total Acreage: 39.28 acres

D.6.1 Description and Background



Ukumehame WETS is located on western leeward side of Maui. The 39.28-acre range was constructed in 1990 along the coast. The firing range is dominated by calcareous sand and alluvial soil. The area was converted in 1870 to accommodate sugar cane cultivation; an activity that continued until 1988. The original lease was held by the Olowau Sugar Company but transferred to the Pioneer Mill in 1930. The area was appropriated by the state in 1988 and converted into the HIARNG firing range two years after. The range consists of six dirt berms to accommodate a variety of small arms. Constructed in 1990, Ukumehame Range

consists of a 600 yard KD range, a combat pistol range, a maneuver training area and parking lots to accommodate shooters. There is a range operations and storage building (Bldg. 003) at Ukumehame.

D.6.2 Previous Studies

An archaeological survey of the area was conducted in 1997 (Sinoto). No cultural material or archaeological sites were located during the survey, however; two *heiau* sites are located 0.75 miles away (Sinoto 1997 *In* HIARNG ICRMP 2008).

Table D-10. Previous studies at Ukumehame.

Authors	Date	Title
Sinoto	1997	<i>An Archaeological Assessment of the Native Plant Conservatory Project, Ukumehame Firing Range, Ukumehame, Lahaina, Maui TMK 4-8-2:4</i>

D.6.3 Description of Cultural Resources

No historic properties are located on the firing range. No prehistoric properties are located on the firing range.

D.6.4 Cultural Resources Summary

- There are 39.28 acres at this site, an unknown portion of the area was surveyed by Sinoto (1997) for archaeological resources.
- No archaeological sites have been located.
- Of the 4 buildings and structures at this site, 0 are currently 50 years old or older. This site has not been surveyed to determine whether it includes a historic district / historic landscape.

- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.6.5 2016-2021 Management Actions

Table D-11. Cultural Resources Management Projects at Ukumehame for FY 2016-2021.

Project #	Description	Status
	Consult with SHPD, NHOs, and external stakeholders under HRS Chapter 6E for ground disturbing activities. Follow SOPs for inadvertent discovery of human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	
	Develop an external stakeholder consultation contact list, including preferred contact method, POC, and what undertaking they would like to be contacted about.	

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D.7 Kaunakakai RC (15A50), Molokai

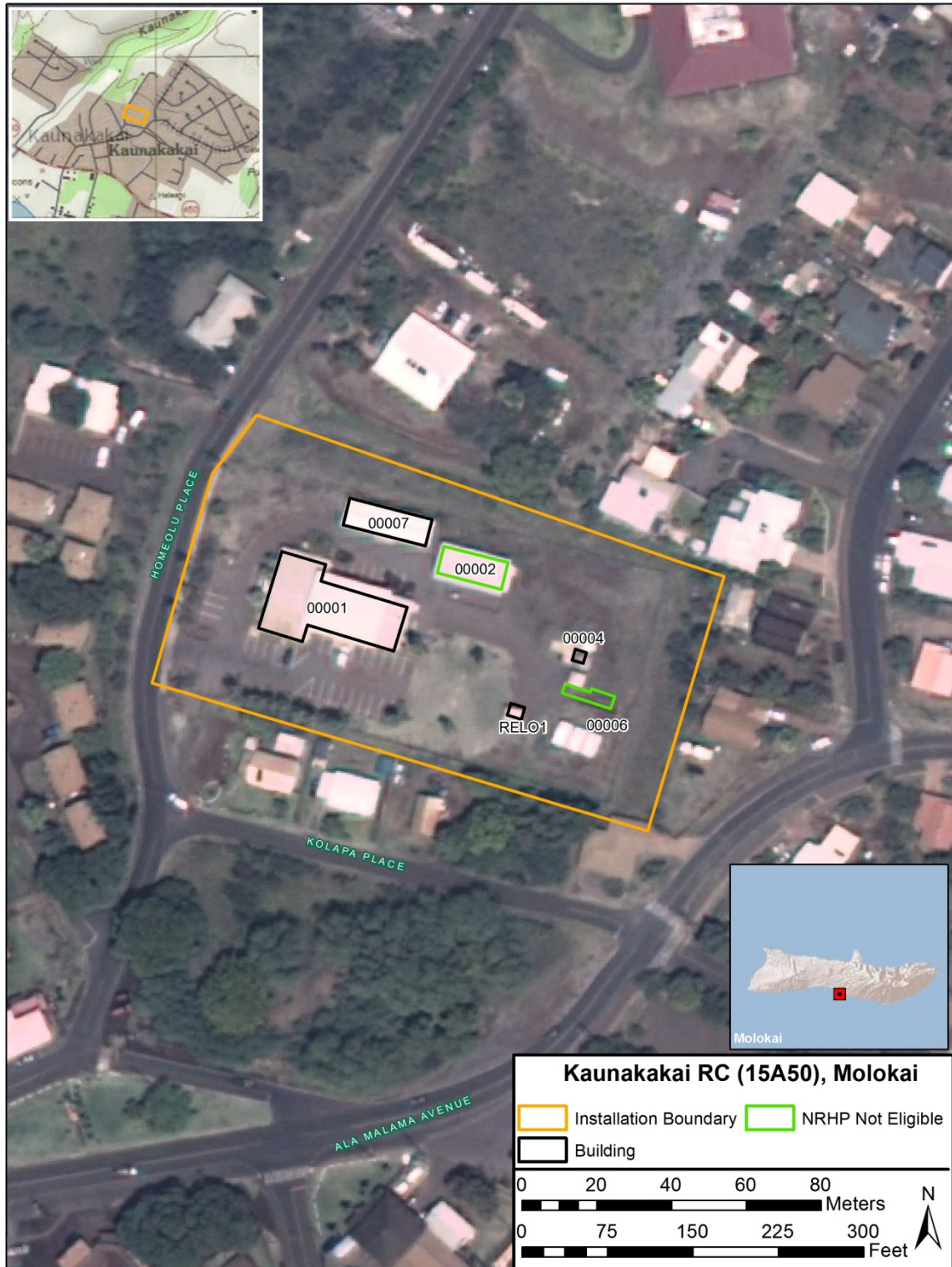


Figure D-12. Kaunakakai RC Cultural Resources.

District: County: Maui **Town/Area:** Kaunakakai

PRIDE Installation Code: 15A50

TMK #: 5-3-09: 07

Support: Federal & State

Total Acreage: 2.52 acres

D.7.1 Description and Background



Kaunakakai RC is located on the southern coast of Molokai north of the center of the town of Kaunakakai. The 2.52-acre property sits on a gently sloping drainage within the alluvial fan with coral sand soil. The facility consists of an RC built in 1996; an Organizational Maintenance Shop (OMS) built in 1939; and storehouses, one constructed of concrete block in 1981 and one of wood in 1959. Attached to the OMS building is a general-purpose storage shed built in 1950.

Formally brought into service on April 26, 1937, Company K of the 299th Infantry of the Hawaii Army National Guard on Molokai came under the command of Captain Frank Kinnison. The Molokai National Guard Unit was comprised of more than 75 percent Hawaiians and part Hawaiians, a much higher percentage than any other unit in the Hawaii Army National Guard. Until construction of the RC in Kaunakakai, the unit originally occupied Hoolehue Hall in Hoolehue. Dedication of the new RC on March 5, 1939 occurred before a crowd of over 3,000 people and became the largest government building present on Molokai at that time (Anderson, 1997). In 1996 the original RC was demolished and replaced due to extensive termite damage.

D.7.2 Previous Studies

The HIARNG performed HABS documentation (completed in 1994) in accordance with the Memorandum of Agreement (MOA) for the demolition of the 1939 RC. The RC was replaced in 1995. The HIARNG also conducted a literature search (completed in 1997) aimed at identifying the history of the Molokai cannon.

E²M was contracted to survey two structures (Building 002 and 003) and conduct a cultural landscape assessment of the HIARNG RC. The company found that Building 002 was part vehicle maintenance associated with the original 1939 wooden RC. The building consists of a vertical board wood and board and batten siding with a low pitched shed roof on concrete slab. The structure has three bays and an enclosed area. Building 003 was constructed in 1959 as a flammable materials storage facility. The building is wood frame with side gable roof on a concrete slab. Both buildings were found not eligible for listing on the NRHP due to lack of association with the once extant 1939 RC. Building 002 was also significantly altered. The survey also found that the RC did not qualify as a cultural landscape due to the loss of the 1939 RC.

Table D-12. Previous studies at Kaunakakai RC.

Authors	Date	Title
engineering-environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation of Ten Facilities Hawaii Army National Guard

D.7.3 Description of Cultural Resources

Historic Properties: The 1939 RC had been determined eligible for the State and National Register of Historic Places; however, because of extensive termite damage it was uneconomical to rehabilitate. After Section 106 consultations, a new RC replaced the old in 1996 under a Memorandum of Agreement (MOA) between the NGB, HIARNG, SHPD, and the ACHP.



The Molokai Cannon - The Molokai Cannon is one of a battery of eight purchased by King David Kalakaua (1836-1891) from the Royal Monarch of Austria during his 1881 trip around the world (Anderson 1997). Each field piece represents one of the eight Hawaiian Islands. The eight brass field pieces were part of the defense system at Iolani Palace until the time of the Provisional Government, and were used against Native Hawaiian citizens during the counter-revolution of 1895. Company D, Artillery, Hawaii National Guard, received the cannon and they were in the HIARNG inventory as late as 1935.

The eight cannons are associated with numerous historical events, perhaps most importantly the failed insurrection by Queen Liliuokalani in 1895 to halt the U.S. annexation of Hawaii. The Molokai cannon represents one of the last pieces of history. Restoration of the cannon was entirely by volunteer Molokai Guardsmen. The cannon became part of a dedication ceremony on January 7, 1996, marking the completion of the newly constructed Molokai RC and the restoration of the cannon.

There are no known prehistoric resources present on the facility.

D.7.4 Cultural Resources Summary

- There are 2.52 acres at this site, of which 0 acres have been surveyed for archaeological resources.
- No archaeological sites have been located.
- Of the 6 buildings and structures at this site, 2 are currently 50 years old or older.
- Two buildings have been evaluated for listing in the NRHP. No buildings have been determined to be eligible. No buildings need further evaluation to make determination of eligibility for listing in the NRHP.
- No buildings and structures will turn 50 years old over the life of this ICRMP.

- This site has been surveyed to determine whether it includes a historic district / historic landscape. Due to the loss of the 1939 RC, the area does not qualify as a cultural landscape or historic district.
- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.7.5 2016-2021 Management Actions

Table D-26. Cultural Resources Management Projects at Kaunakakai for FY 2016-2021.

Project #	Description	Status
	Consult with SHPD, NHOs, and external stakeholders for ground disturbing activities or undertakings involving the Molokai Cannon. Follow SOPs for inadvertent discovery of human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	
	Develop an external stakeholder consultation contact list, including preferred contact method, POC, and what undertaking they would like to be contacted about.	
	Coordinate with PAO and Unit Commander for the ongoing restoration and maintenance of the Molokai Cannon.	

D.8 Ft. Ruger (15A20), Oahu

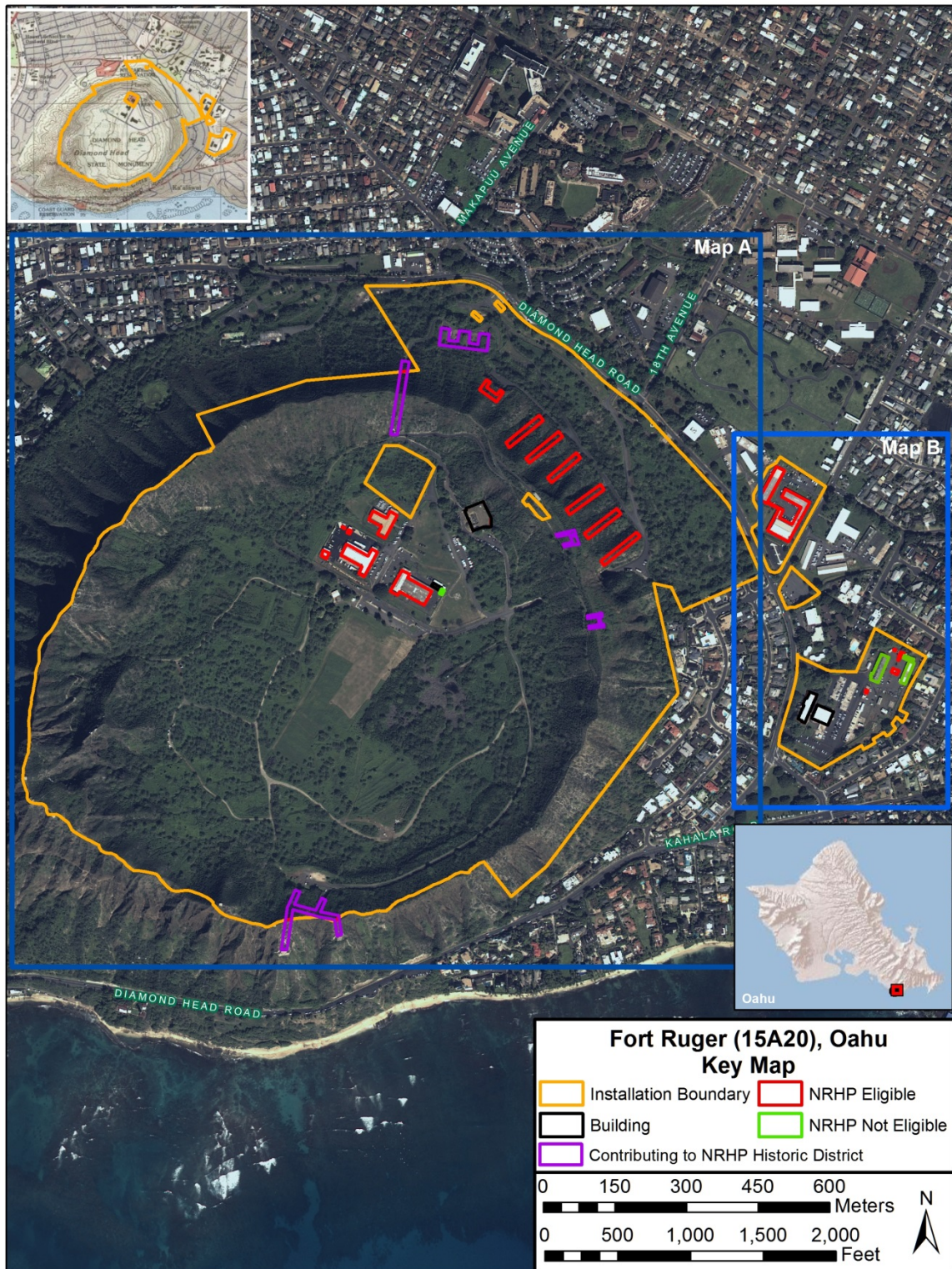


Figure D-13. Ft Ruger Cultural Resources.

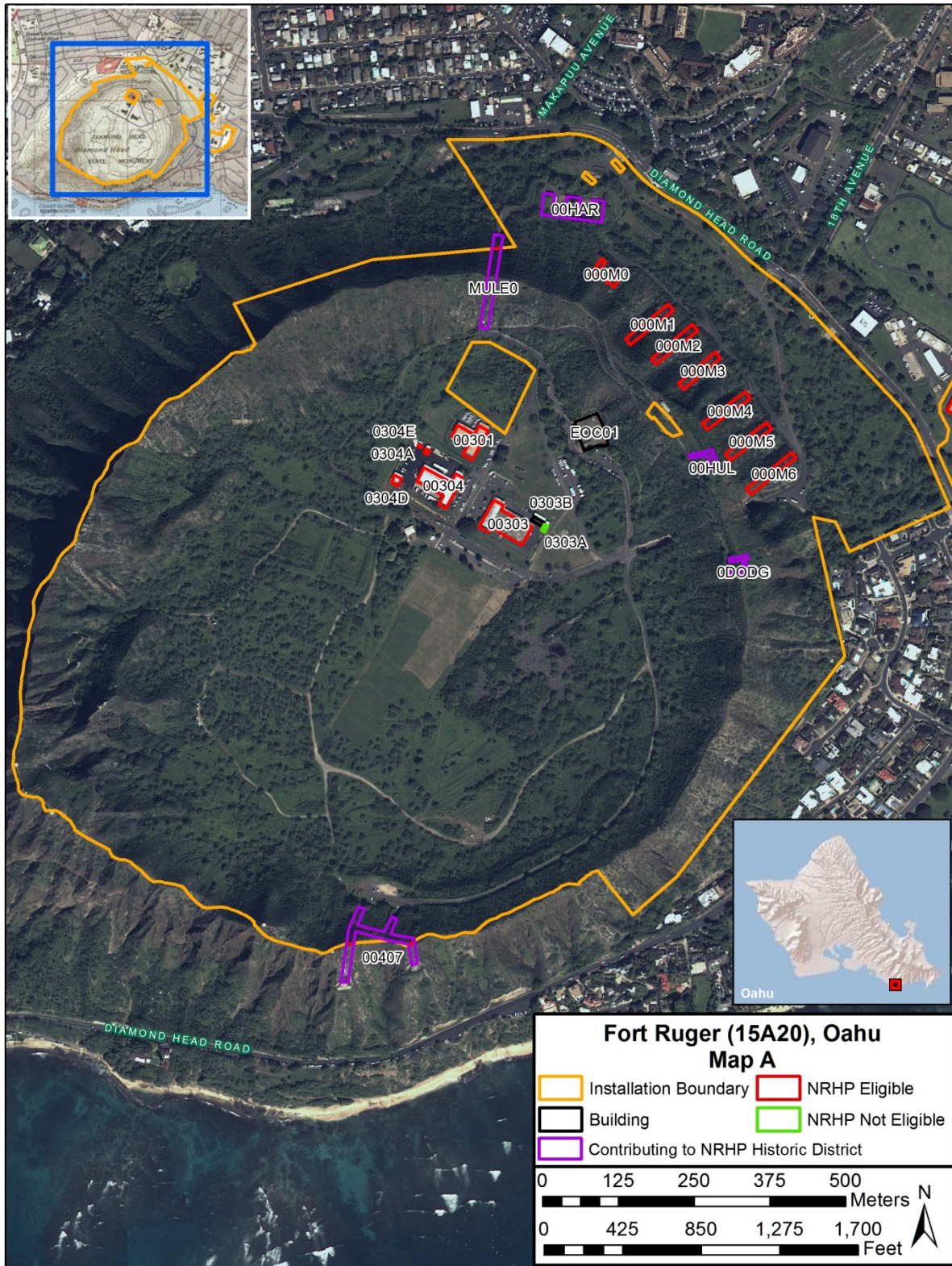


Figure D-14. Ft Ruger Cultural Resources.

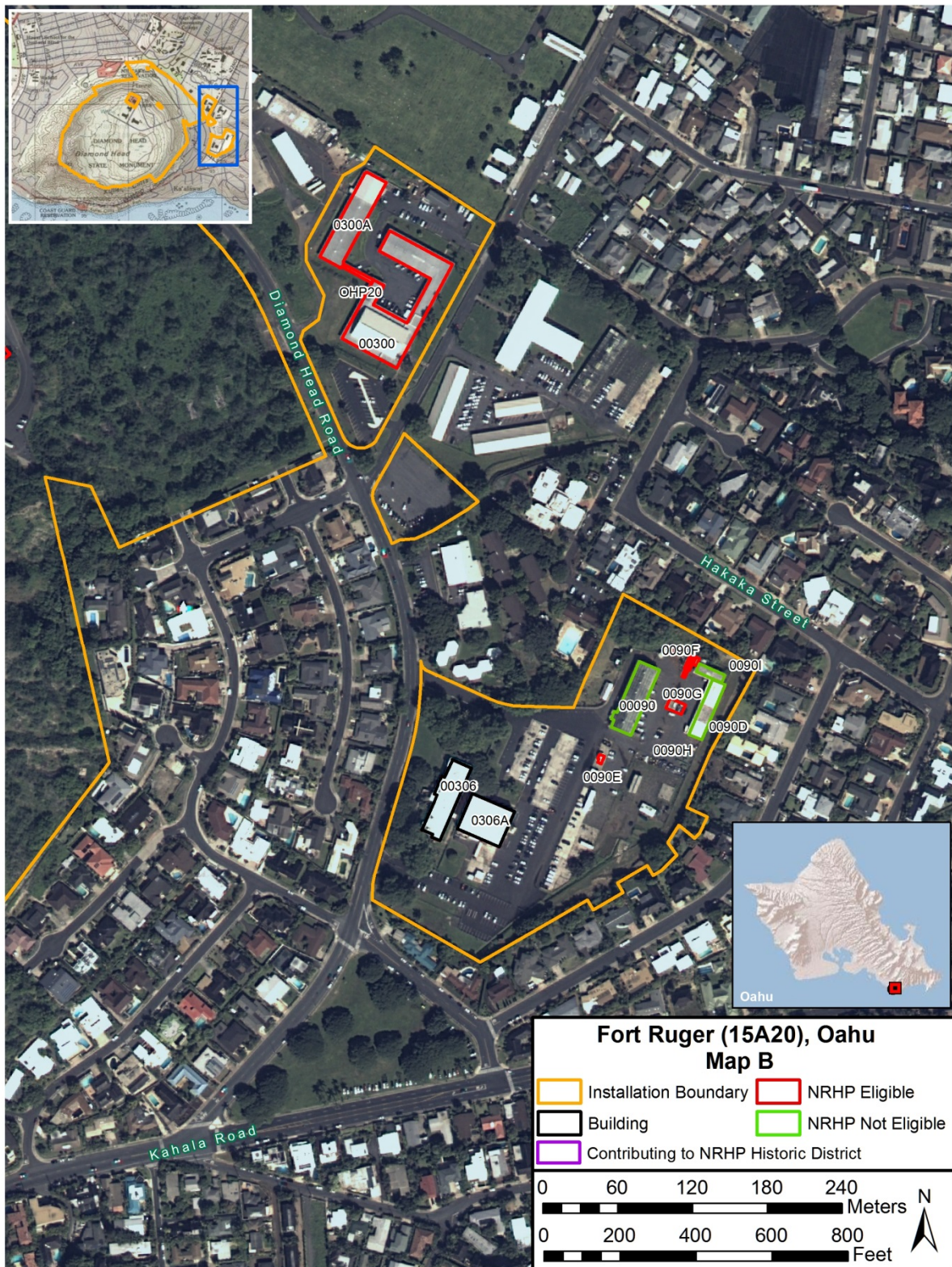


Figure D-15. Ft Ruger Cultural Resources.

District: Honolulu **County:** Honolulu **Town/Area:** Honolulu

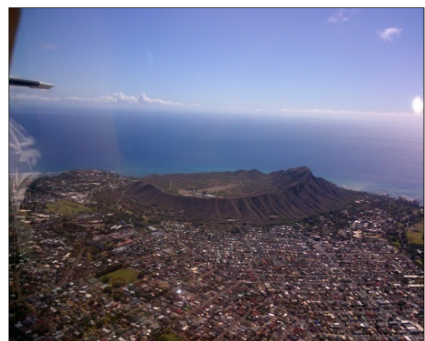
Pride Installation Code: 15A20

TMK #: 3 - 1 - 42: 18, 19, 41 & 6

Support: Federal & State

Total Acreage: 325

D.8.1 Description and Background



Diamond Head Crater is located on the southeast extension of O'ahu within the Honolulu-Waikiki urban area. Ft. Ruger consists of 325 acres that includes the interior of Diamond Head crater and two small administration areas in Kahala to the east. Ft. Ruger is located on the east slopes of the crater. The interior of the crater is also part of the Diamond Head State Monument. Diamond Head is a tuff cone formed during the Honolulu Volcanic Series that created the eastern half of O'ahu. Diamond Head was created by a single volcanic event. Soils within the crater are silt loam around the perimeter however, the center contains fill. Depending on rainfall, a marshy area varies in size in the eastern portion of the crater. The interior of the crater has been heavily modified by the military between 1909 and 1962. Facilities include tunnels, subterranean operations centers, semi-subterranean batters, above-ground offices, armories, and maintenance shops. Twenty-nine buildings and structures are located within the crater. Construction dates range from 1909 to 1966. The remaining 23 buildings are located in the administration areas and were constructed between 1942 and 1978.

Diamond Head was known as Leahi, the exact meaning of which is uncertain. It is said that Hi'iaka, the younger sister of the goddess Pele, compared the shape of the mountain to the *lae* (brow) of the *ahi* (tuna). Other translations include "fire headland" or "wreath of fire," possibly referring to the ancient practice of keeping a fire burning at the crest to help guide canoe fleets bound for Oahu. In the early 1800s, Leahi was renamed Diamond Head in reference to British sailors who mistook the calcite crystals found in the crater for diamonds. At least five *heiau*, or ancient temples, were built on or near Diamond Head. Papa'ena'ena, located on the seaward slope of Diamond Head, was the most prominent and the site of human sacrifices. Erected by King Kahekili after his conquest of Oahu, Kamehameha I sacrificed Kahekili's son Kalanikupule there along with those chiefs of Oahu defeated at the final battle at Nuuanu Pali. Kamehameha's nephew Kanihonui was sacrificed at Papa'ena'ena for breaking *kapu* (taboo) with Queen Ka'ahumanu. Other *heiau* included Ahi, the site at Leahi's peak where the navigation fire was kept lit; Pahu-A-Maui, a fisherman shrine near the present day Diamond Head lighthouse; and two near Kapiolani Park, Kapua and Kapalaha. Diamond Head was also used for *holua* (sled) sliding, a favorite pastime among the Hawaiians. Oahu chiefs put criminals to death by throwing them from Leahi's summit.

In 1898, Ft. Ruger became the first military installation in the Territory of Hawaii (Allen and Shideler 1996). Dedicated to the Army Corps of Engineers, cavalry, and artillery units, the reservation became part of the Pacific Coastal Defense System mandated by President Roosevelt. Ft. Ruger is the location of

Battery Harlow, the oldest coastal battery in Hawaii, and the last of its kind in the world. Battery Harlow is the first structure built at Ft. Ruger and is the cornerstone for seven batteries within Diamond Head Crater. The size of Ft. Ruger ebbed and flowed according to WWI and WWII. By the 1970's, most of the structures on the installation had been demolished. Only concrete pads and basalt and mortar walls mark large areas where housing, a Chinese school, a bowling alley, tennis courts, a swimming pool, a gas station, and other recreational and military structures stood.

As Hawaii's first military installation, constructed in 1906, Ft. Ruger contained extensive infrastructure including water, electricity, and roads, as well as housing, recreational facilities, administration and supply areas, hobby shops, a restaurant, and other facilities related to a fully functional military base. The entire ground level infrastructure has been removed. The only extant buildings related to WWI and WWII outside the crater in Ft. Ruger are the Chapel (now part of Kapiolani Community College), the Ft. Ruger theater (now the Diamond Head Theater), and Battery Harlow. The remaining batteries and other historic structures lie within the crater in the State Monument area. State Parks plans on taking over Batteries 407 and Harlow once the HIARNG abandons Ft. Ruger and the land is returned to the state. Various pads, rock walls, and roads still remain, and are currently being recorded for a GIS map.

In 1962, the State established Diamond Head Crater as a State Monument and in 1968 designated it a National Natural Landmark, placed under the control of the Hawaii State Parks. The crater was placed under the management of DNLR in 1975. Ft. Ruger and Diamond Head Crater were nominated as a NRHP historic district in 1983. The State Monument, and all the facilities associated with the Hawaiian Seacoast Defense System, is on the State Register of Historic Places and the NRHP. The following timeline tracks the establishment, use, and closure of Ft. Ruger:

D.8.2 Previous Studies

The history of Diamond Head has been researched extensively and cultural resource surveys have been conducted within the interior of the crater. Histories of Diamond Head were first produced by Thomas Thrum in the late 1800s while Carter and Wilder conducted an amateur archaeological survey in 1906 (Clark 1977 *In* Tomonari-Tuggle and Blankfein 1998). The first professional archaeological study was conducted by the Bishop Museum as part of a survey of O'ahu's cultural sites. The Bishop Museum conducted an excavation near the reported location Papa'ena'ena Heiau. While the *heiau* was destroyed previously, the crew noted imported topsoils above the original soil and bedrock. In 1983 Hibbard and Napoka evaluated Ft. Ruger as a Historic District. The area was nominated for the NRHP for its significance in Hawaiian and Military history (Hibbard and Napoka 1983 in E²M 2009). The district includes the batteries, buildings, and other historic structures associated with Ft. Ruger.

Four archaeological surveys have been conducted inside Diamond Head Crater. The Division of State Parks carried out a reconnaissance survey as part of the summit trail along the rim of the crater in 1977 (Griffin and Yent). Two concrete foundations were located near the trail. Allen and Shideler (1996) conducted an intensive literature survey and inspection of Battery Harlow in preparation of a conservation and preservation plan. In 1997, Tomonari-Tuggle and Blankfein conducted a survey of the 0.9-acre care FAA CERAP facility located at the northern end of the crater. The fenced area included three buildings, constructed in 1961, and drainage tunnels. They found that no archaeological or

Table D-13. Ft. Ruger timeline.

Date	Activity
1898	First Military Instructing, Camp McKinley.
1904	U.S. purchased 729 acres for \$3,300 and additional land purchased to make 755 acres for Coastal Artillery companies.
1907	Construction of mortar batteries, bunkers, gun mounts, storage tunnels, OPs, and communications rooms.
1908-1910	Stairs to 763 foot summit and fire control system to direct guns from Wai'anae to Koko Head built. Cable car system to move men, supplies, and 9 billets to housemen. Forty foot stairs lead to 225 foot long tunnel and 99 more steps. There were four levels of fire control stations at Ft. DeRussy and Batteries Randolph and Dudley.
1909	Ft. Ruger named for MG Thomas H. Ruger, a Civil War hero.
1909	105 th and 159 th Coast Artillery Companies occupy tents beginning 14 August.
1910	Battery Harlow completed in February. Holds two mortar pits, each with four 12" mortars.
1911	Permanent buildings constructed.
1914-1915	Battery Dodge completed with two, 16' 2" guns that had been installed in 1898.
1916	Hawaii Civil Defense occupies Battery Birkhimer in DHC. Battery chosen because of its location within a tunnel eight feet thick, with 14,728 square feet available underground, four to six foot thick walls, and water storage capabilities.
1917	Ft. Ruger infrastructure completed.
1920-1922	Third Balloon Company continued construction.
1930	Anti-aircraft guns installed.
1940	Camouflage nets used to conceal trails.
1941	Twelve (12") mortars and several three inch guns installed within the crater and at Black Point, Gun Park, and other locations around Ft. Ruger. Ft. Ruger becomes HQ for the Hawaii Coast Artillery Command.
1943	Construction on Battery 407 commences. Two 8" anti aircraft guns not installed.
1950	Military area closed down and opened to the public. All guns dismantled and removed. Reservation turned over to the HIARNG. Robert C. Stevenson, Commander, 298 th RCT, takes charge of Ft. Ruger on 15 February from units of the HIARNG 298 th RCT and 613 th motor maintenance. Ordnance Company and State HQ staff quartered at Ft. Ruger.
1955	EO returns 595 acres of Ft. Ruger to the Territory of Hawaii for use by the HIARNG. Army retains 80 acres for officer and enlisted personnel quarters, the Cannon Club, theater, and warehouses.
1961	The FAA Air Route Traffic Control Center built in the center of the crater.
1974	Army deeds 51.6 acres on 23 July to State for \$5.4 million in order to construct Kapiolani Community College (KCC).
1977	The HIARNG removes cannon acquired from Battery Dodge from Army HQ at Ft. Ruger and displays them at 487 th Artillery RC on 22 nd Ave.
1993	Wahiawa RC expansion for the 487 th Artillery includes display of the cannon at this RC.

historic properties were located within the area. All buildings were constructed after 1959 and thus did not meet the minimum age requirements for NRHP consideration. In 1998, Tomonari-Tuggle and Blankfein returned to Diamond Head Crater to conduct an archaeological assessment of the remaining areas. They noted that while “historical research indicates a long history of human activity around the crater, but not within the crater itself, it was not until the 20th century and the development of coastal defenses that significant, land-form altering events took place” (Tomonari-Tuggle and Blankfein 1998). The survey found no evidence of Native Hawaiian sites; only remains of military activity related to the Ft. Ruger Military Reservation remained. Tomonari-Tuggle and Blankfein (1998) noted remnants of the rifle range, various gun emplacements, observation posts, and communication antennae along the crater rim. Developing archaeological sensitivity zones was recommended (Tomonari-Tuggle and Blankfein 1998).

E²M conducted a historic building survey and evaluated 32 resources at Ft. Ruger/Diamond Head Crater (2009). The survey noted that many buildings and structures were previously evaluated for their NRHP eligibility and are listed as part of the existing NRHP historic district. Contributing elements include Battery Harlow (0HAR1-0HAR16), Battery Hulings (00HUL), Battery Dodge (0DODG), Battery Birkhimer, Battery 407, Leahi Fire Control Station, Leahi Staircase, all gun emplacements, and Mule Tunnel (MULE0). All buildings were evaluated for individual eligibility. The survey found that the district’s period of significance should be expanded through the Cold War Era. This would expand the boundaries outside of the Crater to include Building 300. Thirteen facilities were evaluated for individual NRHP eligibility. E²M found that Vault No III (0Vaul), the M Tunnels (000M0-00M6), Building 300, and Building 301 are eligible for listing on the NRHP under Criterion A and C. Buildings 00090, 0090C, and 0090D were not recommended as eligible for NRHP listing.

A cultural landscape assessment was also conducted as part of the 2009 survey, but only for the military landscape. Dates for Ft. Ruger span from 1906 to the end of the Cold War in 1989. The cultural landscape encompasses military resources within the crater and the former boundaries of Ft. Ruger. The current boundaries of the Ft. Ruger Historic District “do not encompass all the elements that would compose a cultural landscape...it is recommended that the period of significance be expanded to include the Cold War era and additional resources from this period” (E²M 2009). The current district does not demonstrate the importance of the connection between the crater interior and exterior through a network of tunnels, observation posts, roads, and communications systems used at the military installation.

HDR, Inc. conducted a historic building survey and NRHP evaluation at five HIARNG installations. HDR surveyed 27 facilities, 45 years and older at Kekaha WETS and Hanapepe RC on Kauai, Ft. Ruger, and Waiawa Gulch UTES & RTSM on Oahu, and KMR on Hawaii. Fieldwork was completed in March 2014 and following consultation with SHPD, the final report was completed in December 2014 (Blackwell and Barnes 2014).

The Ft. Ruger Historic District's period of significance was recommended to include World War II and the Cold War, also previously recommended in 2009 (E²M) and two buildings, 00303 and 00304, were recommended as contributing elements to the Ft. Ruger Historic District under the expanded period of significance. The stone walls and stone guardhouse on the east side of Diamond Head Road near Building 306 were also recommended as contributing elements to the Ft. Ruger Historic District under the expanded period of significance. Unlike 303 and 304, the stone walls and guardhouse are located outside the NRHP boundary and HDR recommends updating the NRHP listing to include the expanded period of significance and the boundary expanded or possibly added as a non-contiguous area to include

the stone walls and guardhouse (Blackwell and Barnes 2014). Further landscape analysis such as Strength, Weakness, Opportunity, and Threat (SWOT) and Observation and Fields of Fire, Cover and Concealment, Obstacles, Key or Decisive Terrain, Avenues of Approach (OCOKA) analysis based on digital elevation models (DEM) represent sound approaches to military landscape analysis, but are not a part of the ICRMP process.

The Ft. Ruger Historic District is an NRHP listed, noncontiguous district encompasses a portion of the remnants of Oahu's earliest U.S. Army coastal defense fortification and includes structures located in Diamond Head Crater and adjacent areas. (Hibbard and Napoka 1980). The following facilities under HIARNG control are contributing to the Ft. Ruger Historic District.

Table D-14. Previous studies at Ft. Ruger.

Authors	Year	Title
Pacific Planners Corporation	n.d	History of Diamond Head
Griffin and Yent	1978	Memo to Robert Fletcht: Results and Recommendations of the Walk-through Reconnaissance in Diamond Head State Monument.
Hibbard, Don and Nathan Napoka	1983	Ft. Ruger Historic District
Allen and Shideler	1996	Intensive Literature Search and Limited Site Inspection for the Purpose of Compiling a Preservation and Conservation Plan for Battery Harlow Oahu Island, Hawaii
Drolet and Sinato	1997	An Archaeological and Historical Assessment of the Federal Aviation Administration CERAP in Diamond Head Crater
Tuggle, M. J and Roger Blankfein	1998	Exploring a Backdrop to Waikiki's Past: Historical Research and Archaeological Assessment of Diamond Head State Monument, Oahu
R.M. Towill Corporation	2000	Restoration Feasibility Evaluation for Battery Harlow, Ft. Ruger, Honolulu, Hawaii.
engineering-environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation Report of Ten Facilities Hawaii Army National Guard
Blackwell and Barnes	2014	Final Historic Building Survey and Evaluation Report at Five Facilities Hawaii Army National Guard

Battery Harlow - Battery Harlow (0HAR01-0HAR16) was constructed in 1909 and was part of the Pacific Sea Coastal Defense. The battery consists of four gun mounts in each of the three bunkers. The bunkers are, separated by two courtyards. The center bunker is three levels: the ground level houses a bunker with four chambers, the second level was used as the data transmission and plotting room, and the third level served as the command post. The upper command post is accessed by concrete steps with iron railings. The central bunker is flanked on both sides by the one-story east and west bunkers. These bunkers contain the same layout as the central bunkers first floor and are divided into four chambers. Concrete blast shields were added to the ground level bunkers in 1942. The Battery has undergone a few changes including filling in the former mortar pits and the addition of the chain link fence erected in the east courtyard. The chambers within the bunkers are currently used for storage.



Battery Hulings/Storage Building General Purpose - Battery Hulings (00HUL) was built between 1914 and 1915 on the east rim of Diamond Head Crater. The Battery was built concurrently with Battery Dodge. Battery Hulings is an H-Plan structure with two main tunnels bored in the rim of the crater. An



additional tunnel links the main structure to the nearby gun emplacements. The tunnels are five feet wide and eight feet tall and names of each are “painted on the walls—the northern tunnel is the “Koko Head Hallway,” the southern tunnel is the “Ewa Hallway,” and the lateral connecting tunnel is the “Kaimuki Hallway” (E²M 2009). A small room is located off Koko Head tunnel just before the set of steps leading up to the casemated gun emplacement. Kaimuki Hallway includes two storage rooms for ammunition. Lava stone retaining walls were constructed out from the northern gun emplacement. Battery Hulings gun

emplacements were welded and blocked from the outside using hollow tile block to discourage trespassing. New additions to the Battery also include electrical conduits that run from the entrance to the interior of the crater.

Battery Dodge/Storage Building General Purpose - Battery Dodge (0DODG) was constructed between 1914 and 1915 concurrently with Battery Hulings, located to the north, and is of the same building design. Battery Dodge is an H-Plan structure with two main tunnels bored in the rim of the crater. An additional tunnel links the main structure to the nearby gun emplacements. The tunnels are five feet wide and eight feet tall, however; unlike Battery Hulings, the tunnels did not appear to be named. A set of stairs leading to the gun emplacement is located at the end of each tunnel. Two storage rooms are located off the lateral tunnel. Alterations to the Battery include the same security block and welded steel construction to keep out trespassers. Damage was noted in the E²M (2009) survey: “reinforced concrete on both the interior and exterior of Battery Dodge has weathered less well than at Battery Hulings. Concrete has spalled both inside and outside where iron rebar has rusted. The ceiling leading to the southernmost gun emplacement shows the worst of this damage with large portions of the concrete spalled and fallen.”



Mule Tunnel Storage - The Mule Tunnel (MULE0) was constructed through north rim of Diamond Head Crater in 1909 to transport mule-drawn materials for fortification construction. The tunnel is 580 feet



long, 8 feet wide, and 7 feet tall and once contained light gauge rail. Storage rooms, located at the north entrance, were constructed in 1934. The rooms are a series of chambers dug into the west wall. The central chamber is the largest and was used as the switchboard room. A series of adjacent 10 x 10 rooms were utilized as offices. Alterations to the tunnel include two periods of enlargement, once in 1932 and again in 1961, and leasing of the chambers as storage space. The three northernmost office spaces are currently leased to various organizations, such as the American Red Cross.

Battery 407/Emergency Operations Center - Battery 407 (Building 407) was constructed as part of a fortification mandate by War Department in 1943 and 1944. Six new batteries were to be constructed throughout Oahu, however; none of these were completed before the end of the war. Battery 407 was the furthest along but construction halted in 1945. The Y-Shaped structure, dictated by the crater rim,



has two tunnels leading to two casemated gun emplacements. Ammunition storage rooms are located off the main tunnels. The interior of the building contains vaulted ceilings and concrete veneer walls with large arched openings. Poured concrete along the slope was used to control erosion. The main tunnels and storage rooms are unaltered. A few of the storage rooms were adapted for conference rooms and the Emergency Operations Center. Alterations to this room include a drop down ceiling, electrical conduits, and HVAC system.

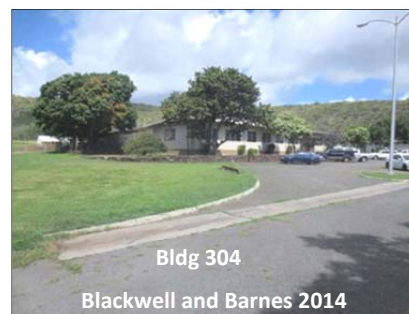
EOC01/Battery Birkhimer - Battery Birkhimer is located on the floor of the crater, near the rear. It also is made of reinforced concrete and primarily lies beneath the ground. Only its concrete portals are visible from the surface. This battery has been recycled and presently serves as office space for the State Department of Defense. Completed in 1916, this battery originally was armed with four 12-inch motars.



Building 303, 304 -Buildings 303 and 304 are cold war-period buildings constructed in 1964 and both contribute to the history of military development and use of Diamond Head Crater during the twentieth

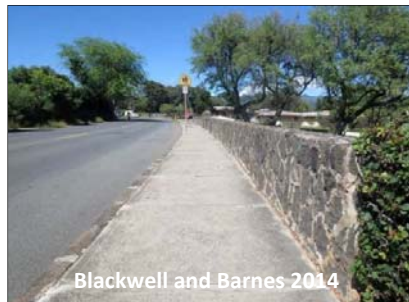


century. The Ft. Ruger period of significance of the historic district was recommended to be expanded to include the World War II and Cold War periods (E²M 2009). Buildings 303 and 304 are NRHP eligible as contributing elements to the historic district under the expanded period of

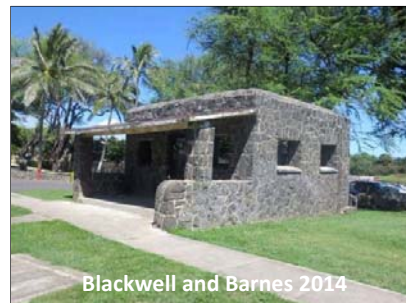


significance (Blackwell and Barnes 2014).

Stone Walls and Guardhouse. Mortared lava rock walls and a guardhouse in front of HIARNG Building 306 on the east side of Diamond Head Road were constructed between 1935 and 1936 and are NRHP



eligible as contributing elements to the Ft. Ruger Historic District, although they are presently outside of the current district boundaries (Blackwell and Barnes 2014). The low stone walls are constructed of lava rock and mortar and located along the north and east sides of the



road. The stone walls are in front of Building 306 and part of the original landscape design. The rectangular guardhouse is located southwest of Building 306, just outside of the HIARNG gate and adjacent to the road. Multiple repairs have been made to the walls and the guardhouse is lacking a roof and currently houses electrical equipment (Blackwell and Barnes 2014).

The following facilities under HIARNG control are listed or determined individually eligible for NRHP.

M-0 Tunnel - The M0 Tunnel (000MO) is the westernmost of the M tunnel used for work and storage space. The tunnel is located on the north exterior slope of Diamond Head Crater, extending southwest into the slope of the crater. The tunnel consists of a generator and boiler rooms, restrooms, and two chambers with an entrance is concrete set into the rock face. The interior of the tunnel is an irregular arch 8-10 feet high sinking into the crater 62 feet before turning 35 degrees and extending another 16 feet to a double door. Inside the door in the main chamber three concrete block rooms were constructed on the right side. There is a panel in the floor near the bathroom leading to a storage area beneath the floor and a telecommunications framework in the main room. A smaller chamber measuring 20 feet wide and 13 feet long leads to a second tunnel that leads outside. The tunnels were determined eligible for listing on the NRHP under Criterion A and C for their significance during WWI and WWII periods of Ft. Ruger. DLNR has a use agreement to use M-) Tunnel for storage.



M1-M6 Tunnels - The M1-M6 tunnels vary in length but are otherwise identical. Lengths of the tunnels range from 240-295 feet. The entrances of the tunnels have arched concrete entryways with concrete surrounds measuring nine feet wide and eleven feet tall. The tunnels are 20 feet wide with two blast walls in the interior. Alterations to the tunnels include removal of the blast walls in the M1 tunnel. The tunnels were determined eligible for listing on the NRHP under Criterion A and C for their significance during WWI and WWII periods of Ft. Ruger. Use agreements have been made with the American Red Cross and other organizations to use the M Tunnels for storage.

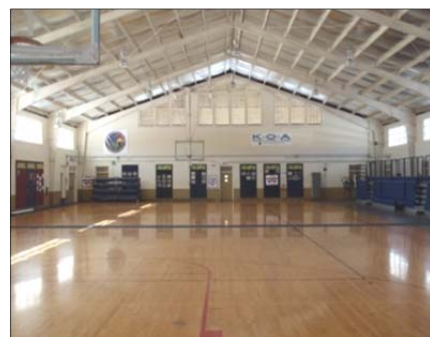


Building 300 - Building 300 is a three-unit RC, concrete block building located to the northeast of Diamond Head. The U-Shaped building consists of a gymnasium and office space, connected by a



breezeway, surrounding an asphalt courtyard. The gymnasium has a medium pitched roof with corrugated metal. Clerestory windows are located on the northwest and southeast sides. The remaining wings have a flat roof. The shortest wing off the northwest corner connects to Building 300A. The office wing of Building 300 has a series of aluminum slider windows with metal awnings. A shed roof is located over the interior courtyard section supported by round metal columns. This section has a set double-leaf metal doors with upper lights, fixed rectangular windows, and metal awning windows. Building 300A is a rectangular building with a

low-pitched side gabled roof. The entrance is faces southeast under the connecting breezeway. Several windows have been replaced with fixed glass blocks and the original jealousy windows have been repaced with viynal clad replacement awning windows, however Building 300 retains its historic integrity despite changes to the historic fabric of Bldgs 300 and 300A. Building 300 was determined eligible for listing on the NRHP for its “state significance to the Cold War and Hawaii Army National Guard history (Criterion A)” as well as for its “architectural design typical of the later period of Hawaiian Army National Guard RC construction in the 1960s (Criterion C)” (E²M 2009).



Building 301 - Building 301 is the former RC built within the crater in 1962. The T-shaped building features offices and a perpendicular gymnasium. The one-unit RC is constructed from concrete block with a low pitched gable roof. Surrounding the south side of the RC is a low mortar lava rock wall. The gymnasium has been converted into a workshop. Building 301 was recommended eligible for listing on the NRHP due to “state significance to the Cold War and Hawaii Army National Guard history (Criterion A)” as well as for its “architectural design typical of the later period of Hawaiian Army National Guard RC construction in the 1960s (Criterion C)” (E²M 2009).

Vault No. 111/Storage Building General Purpose - Vault No. 111 (OVAUL) is located on the inside rim of Diamond Head Crater, north of Batter Hulings. E²M (2009) approximated that the vault was constructed in 1915, due to the surrounding facilities. The subterranean room is 10 feet by 10 feet with an 8 foot ceiling. The vault was most likely used as a pyrotechnic storage magazine for both Battery Hulings and Dodge. The interior is made of poured concrete and a set of stone walls lead from the heavy door entrance to a stone lined path. OVAUL is recommended as eligible for listing on the NRHP as a contributing element to the Ft. Ruger Historic District.



There are no known pre-historic resources at Ft. Ruger. Phases of military construction over the course of the past 100 years and park use since the 1960's has erased all visible traces of pre-contact resources at Ft. Ruger.

D.8.4 Cultural Resources Summary

- There are 325 acres at this installation, of which 325 acres have been surveyed for archaeological resources.
- No archaeological sites have been located.
- Of the 40 buildings and structures at this installation, 25 are currently 50 years old or older.
- 40 buildings and structures have been evaluated. 13 have been determined individually eligible for the National Register. 4 buildings have been listed on the National Register under Criterion C. 5 structures have been determined significant contributing features to the Ft Ruger historic district.
- 3 buildings and structures will turn 50 years old over the life of this ICRMP.
- This installation has been surveyed to determine whether it includes a historic district/ historic landscape. This installation does include a historic district. It was recommended (E²M 2009) that the boundaries and period of significance be expanded to include military use of the crater through the Cold War.
- Buildings 303 and 304 are recommended as contributing elements to the historic district under the expanded period of significance (Blackwell and Barnes 2014) and the stone walls and gaurdhouse on the east side of Diamond Head Road near Building 306 are also recommended as contributing elements to the hisotic district. The boundary of the stone walls and guardhouse are non-contiguous with the boundary of the historic district (Blackwell and Barnes 2014).
- There no known resources of traditional, religious, or cultural significance that might be part of a larger cultural landscape.

D.8.5 2016-2021 Management Actions

Table D-15. Cultural Resources Management Projects at Ft. Ruger for FY 2016-2021.

Project #	Description	Status
	Consult with SHPD, NHOs, and external stakeholders for and ground disturbing activities. Follow SOPs for inadvertent discovery of human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	
	Consult with SHPD, NHOs, and stakeholders for any maintenance, repair, rehabilitation, modification or demolition of any historic building and/or structure. Follow best management practices during any undertaking involving historic buildings or structures.	
	Develop an MOA for the transfer of Ft. Ruger land back to DLNR State Parks. Include a contract for the HABS/HAER documentation of Buildings 303 and 304 in the event of demolition.	

D.9 Kalaeloa RC (15001), Oahu

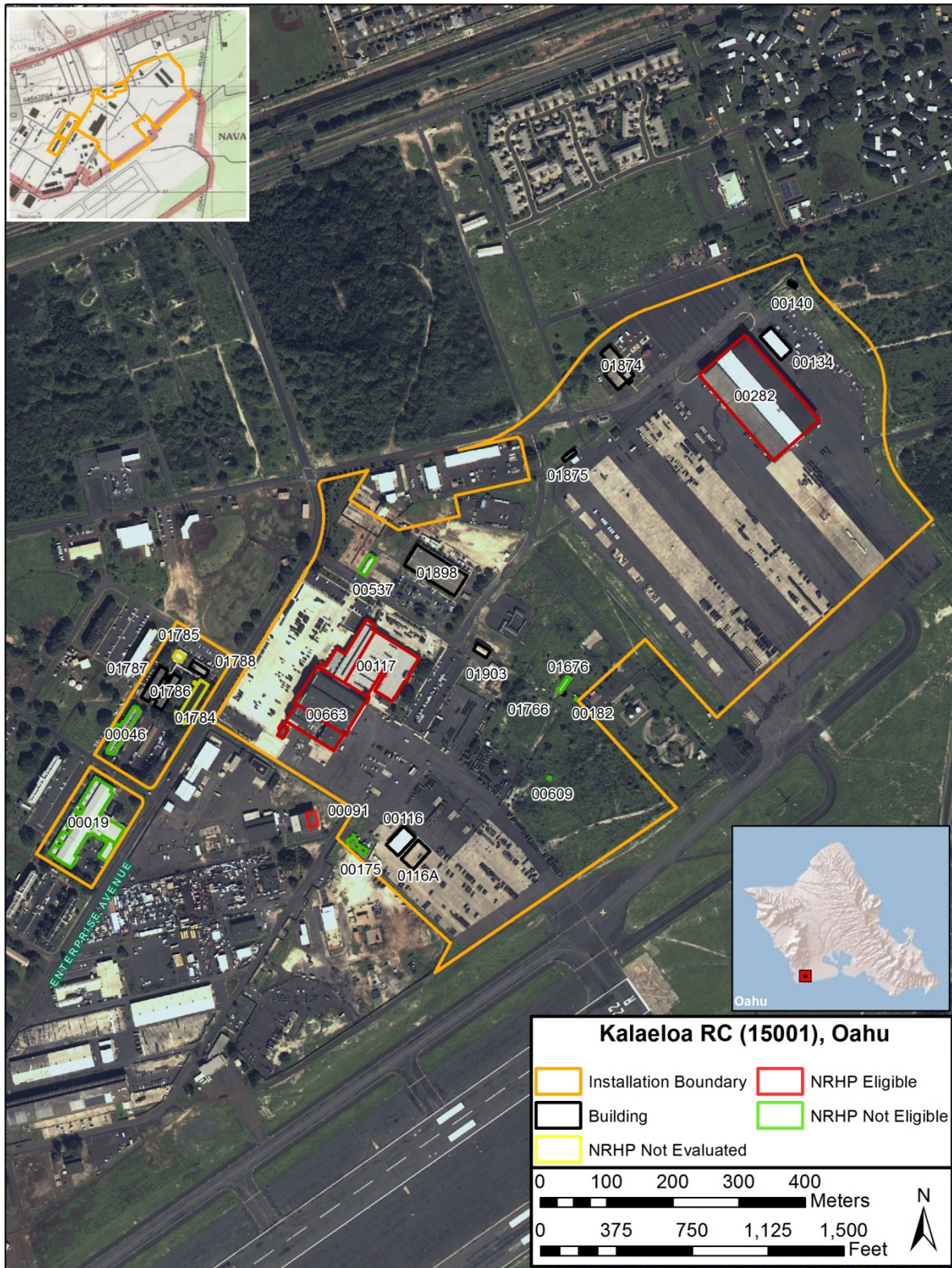


Figure D-16. Kalaeloa RC Cultural Resources.

District: Ewa **County:** Honolulu **Town/Area:** Kapolei
PRIDE Installation Code: 15001
TMK: 9-1-01-30:45 and 9-1-01-30:50
Support: Federal & State (Dept. of the Army)
Total Acreage: 147 acres

D.9.1 Description and Background

Kalaeloa Readiness Center (RC) is a 147 facility located in the inland portion of the former Barbers point Naval Air Station, on the leeward side of Oahu. The RC is in a highly developed area adjacent to the former military airfield. The RC sits atop a limestone outcrop, known for its irregularly shaped pit caves. NAS Barbers point was in operation from 1942 and into the 1990s. The airfield was constructed in 1941 as an alternate for the Ford Island facility. The base was chosen as a BRAC candidate and realignment was completed by 1999 with 150 acres conveyed from the Navy to the Department of the Army. The Hawaii Army National Guard has a license from the DOA (and therefore the land is Federally-owned) to use 147 of these acres, with the other three acres licensed to the Hawaii Air National Guard. The RC consists of 55 buildings and structures and serves as the HIARNG Readiness Center. The facility includes Seafarer's training center, parking lots, military hangars, and military office facilities located at the Kalaeloa Airport.

The NAS land was historically used for agricultural purposes. In 1877, James Campbell purchased the area for ranching and sisal and sugarcane cultivation. In 1932, a portion of the Ewa Plain was acquired by the Marine Corps for a dirigible mooring mast field. Commissioned on April 15, 1942 Barbers Point Naval Air Station's initial goal was to support the air station located on Ford Island in Pearl Harbor. At the start of WWII, the base expanded to accommodate four carrier groups and built housing for 5,650 personnel and expanded its mission to aircraft repair. At one point it was believed that Barbers Point controlled more take-offs and landings in a 24-hour period than any other air field in the world, and engines were overhauled at the rate of 1,100 engines in six months (Hammatt and Schideler 2012).

In 1946 at the start of the Cold War, Barbers Point's mission again changed to that of the main Pacific air station. Its missions included air patrols, headquarters for Fleet Air Hawaii, all-weather training, logistics, and fleet air service (Denfeld, 1995). The base became the home for the Orion P-3V.

In July 1958 Barbers Point became the headquarters of the Pacific Airborne Command as part of the Distant Early Warning Line (part of the Pacific Barrier Force Mission) with planes flying a 3,000 mile long radar flight seven days a week and 24 hours per day to prevent Soviet bombers from getting through. This Barrier force mission ceased operating in 1965. In 1968, VQ-3 became part of the Barbers Point mission, with the responsibility of maintaining communications with US submarines in a "post-nuclear" environment (Denfeld, 1995). By 1989 the end of the Cold War resulted in discontinuing antisubmarine patrols. NAS Barbers Point was officially closed as part of BRAC in 1999. During this time, the HIARNG took over a portion of the area near the airfield.

D.9.2 Previous Studies

Several archaeological surveys have been conducted in the area surrounding the HIARNG facility when it was part of NAS Barbers Point. Within the facility, only a few archaeological surveys and historic building surveys have been completed. The first survey located within the facility was conducted by David Welch (1987). Welch located two probable pre-contact sites within the former Ewa Marine Corps Air Station (Hammatt and Shideler 2012). Haun and Kelly (1991) conducted a 1,310 acre survey of NAS Barbers Point. The survey located 42 sites near the HIARNG facility, including sites 50-80-12-1717, 50-80-12-1758, 50-80-12-1729, and 50-80-12-1745. An additional 20 sites (50-80-12-4548 through 50-80-12-4567) were located on the western end of the airfield by Rosendahl et al 1992 (Hammatt and Shideler 2012).

The first study within the HIARNG facility was conducted by Tuggle et al. in 1997. The baseline survey of NAS Barbers Point “represents the best overview of historic properties within” (Hammatt and Shideler 2012) the Naval Air Station. The survey discussed several architectural features and recommended several buildings for inclusion on the National Register (including the historic buildings found below). No archaeological resources were located within the boundaries of the HIARNG facility.

Hammatt and Shideler (2012) conducted an archaeological assessment and cultural resource assessment of the HIARNG facility to support planning for long-range improvements. The total project area was 43.6 acres spread throughout the northeast and southeast portion of the facility. The survey found that the area was previously graded and no historic properties were located in the immediate vicinity of the study area. The survey also evaluated 44 pit caves for cultural significance. No significant cultural resources were observed in the pit caves.

Two building surveys were conducted at NAS Barbers Point. Previously surveyed buildings include those identified in the historic buildings section (see below). Tuggle et al. 1997 evaluated thirteen buildings now occupied by the HIARNG for NRHP eligibility. The survey found that buildings 0091, 00117, and 00282 were eligible. An additional building survey was conducted by E²M in 2009. This survey reevaluated the buildings from the 1997 survey and found that the recommendations made by Tuggle et al. (1997) were correct for buildings 0091, 00117m and 00282. However, the 2009 survey additionally recommended Building 00663 as eligible for listing on the NRHP under Criterion A and C. During the 2009 survey, E²M assessed the HIARNG facility as a cultural landscape. The company found that after the closing of NAS Barbers Point, the area was taken over by numerous agencies. This has compromised the cohesiveness of the installation however; “there may be future potential for a larger historic district or landscape if survey and re-evaluation were to consider all of the resources collectively” (E²M 2009).

Table D-16. Previous studies at Kalaeloa RC.

Authors	Date	Title
engineering-environmental Management, Inc.	2009	Final historic Buildings Survey and Evaluation Report of Ten Facilities Hawaii Army National Guard
Hammatt, Hallett H. and David W. Shideler	2012	Final Archaeological Assessment Survey (CRAS) Phase I: Background Research and Surface Survey For the Hawaii Army National Guard Kalaeloa Facility, Former NAS Barbers Point, Kapolei, Honouliuli Ahupuaa, Ewa District, Oahu Island, TMK: 1-9-1-013:-0045, 046, 032 por. State of Hawaii Department of Defense Job No. CA-1223
Haun and Kelly	1991	An Archaeological Survey of the Naval Air Station Barbers Point, Oahu, Hawaii
Rosendahl et al.	1992	Archaeological Inventory Survey Contaminated Soil Stockpile/Remediation Facility, Naval Air Station Barbers Point, Oahu, Hawaii
Tuggle et al.	1997	A Cultural Resource Inventory of Naval Air Station, Barbers Point, Oahu, Hawaii; Part I: Phase I Survey and Inventory Summary
Welch, David	1987	Archaeological Reconnaissance of Former Ewa Marine Corps Air Station Barbers Point, O'ahu, Hawaii.
Yokalavich et al.	1995	(Prefinal) Cultural Resources Management Overview Survey, Naval Air Station, Barber's Point, Oahu, Hawaii

D.9.3 Description of Cultural Resources

Building 91 (Power Plant) BDE Vaults - Building 91 is a two story concrete structure built in 1960 as a hardened power plant. The building consists of four foot thick concrete walls with a flat reinforced concrete roof that is six feet thick. The roof overhangs five feet over the main structure. The roof was poured in two sections with multiple steel layers. Only the second floor contains windows however, there are two ventilation openings on the first floor. A concrete awning is located over the main double door leading into the main space. The building was originally used as a power plant and has a main floor that accommodated three diesel generators. The main space measures 84 feet by 74 feet and is 38.5 feet tall. The second story includes vaults and storage rooms accessible from an exterior metal staircase on the western side. The interior of the second story consists of a large open room forming the southeast half of the floor. Vaults and storage rooms were located on the northwest side of the structure. A smaller exterior door to the west leads into the boiler room. The boiler room was not-reinforced however; windows on the second floor have been filled with CMU blocks. The boiler room is smaller than the power plant, measuring 70 feet by 41 feet by 26 feet tall non-reinforced boiler room.



The building was previously evaluated by Mason Architects and recommended eligible for listing in the NRHP under Criteria A and C. Reevaluation of the building in 2009 (E²M) supports the original assessment. The new survey noted that the structure “still retains its historic integrity although it is not currently being used for its original function. It is in its original location and has not been moved. The surroundings are still associated with military use, so the immediate setting, feeling, and association is much the same as it was during the period of significance despite the area not belonging to the Navy any longer” (E²M 2009). The building has previously been the subject of HABS documentation (HABS 1999a).

Building 117 - Building 117 was constructed in 1944 and includes a Hangar, maintenance shop, and offices associated with the repair and assembly of WWII carrier planes. Building 117 is the USPFO, Bravo Company 29th SPT BN, and Facility Maintenance Shop. This building was designed by Albert Kahn and was constructed in 1944 as an airplane assembly and repair shop with attached shops, offices, storage space, classrooms, etc. It was described as “similar to the one built at Jacksonville, Florida, the plans for which were prepared by Roberts & Co., of Atlanta, Georgia” (Contractors, Pacific Naval Air Bases n.d.: A-348). The steel framed structure sits atop a concrete base with CMU block walls and concrete pilings.



The building covers 132,004 square feet with a large hangar section located in the central space measures 275 feet by 16 feet by 64 feet. The hangar opens at both gabled ends for aircraft access. The doors of the hangar include three tiers of wired-glass lights. The shop is located to the southwest of the Hangar. The shop was built with reinforced concrete and measures 275 feet by 125 feet by 44 feet. The shop consists of three work spaces accessible by a roll-up metal door.

The offices occupy the southwest portion of the facility and are connected to the Hangar through hallways. The office is distinct from the hangar facility and was constructed with glass block windows, hipped roof, rounded corners and art deco style tower above the entrance. The offices measure 250 feet by 100 feet by 18 feet and were used in WWII to house the aeronautical engineering department. The offices were also used for training, production control, planning, and material testing. Alterations to the building include replacement of the steel sash windows in the office block with aluminum- framed windows with larger lights. Interior partitions have been relocated, and the ones that were previously open have had enclosure walls built above them. Generally the layout of the office block has been greatly changed over the years, especially the northeast half that was originally shops. Building 117 was previously documented in a HABS study (HABS HI-279-O) and was previously evaluated for NRHP eligibility and recommended as eligible for listing on the NRHP (Tomonari-Tuggle et al. 1997). The building was reevaluated in 2009 (E²M).

Building 282 - Building 282 was constructed in 1958 and used as the Navy Maintenance Hangar. The building is a rectangular two-story CMU block structure with a flat roof. Two metal frame service

pavilions flank the building on either side. The pavilions are supported by steel trusses and columns. The central facility contains fixed metal and awning windows that look onto the service pavilions. The short sides have recessed openings with doorways. The building is currently used as the Readiness Center and is used for offices, storage and classrooms. The pavilions are used for vehicle storage and maintenance. The building has not been altered and the interior, while reconfigured, still retains many of its original components and floor plan.



The building was evaluated for listing on the NRHP by NRHP eligibility by Tomonari-Tuggle et al. (1997). The facility was reevaluated in 2009 (E²M) 2009. The building is significant under Criterion A and C and represents an aircraft repair facility that is unique in its design as an outdoor tropical naval hangar for ASW patrol type aircraft. Such facilities are not found in regions with cooler or more adverse weather.



Building 663 - Building 663 is the aviation armament building constructed in 1943 and used to store weapons and parts. The building is adjacent to, and connected via HAVAC ducts, to Building 117 (Hangar and maintenance shops). The two-story building consists of concrete block with a smaller rectangular one-and-a-half story extension on the northwest side and a small one-story addition to the rear of the facility. The primary entrance of the building is located on the northwest side with a secondary entrance on the one-story structure. The main block was vertical

fixed windows and cantilevered concrete awning extending over all the windows. A concrete stairwell is located at the northeast end of the building however; the interior of the two-story section does not connect to the 1.5 story extension.

This building has been previously evaluated for listing in the NRHP and was found not eligible (Tomonari-Tuggle et al. 1997). A reevaluation of this building by E²M (2009) found that Building 663 is eligible for listing in the NRHP. The survey found that “the building appears to retain its historic integrity despite being unused for an indeterminate amount of time...This building was critical to the repair and maintenance of carrier aircraft that were being repaired. This building housed the armament systems repair...It was purposefully constructed near the southwest shop doors of Building 117 to move weapons and parts needed to re-outfit planes” E²M (2009). Buildings Consequently Building 663 is recommended eligible for listing in the NRHP under Criteria A and C.

D.9.4 Cultural Resources Summary

- There are 147 acres at this installation, of which 43.6 acres has been surveyed for archaeological resources.

- No archaeological sites have been located.
- Of the 33 buildings and structures at this installation, 13 are currently 50 years old or older.
- 13 buildings and structures have been evaluated. 4 have been determined to be eligible.
- No buildings and structures will turn 50 years old over the life of this ICRMP. This installation has been surveyed to and determined that it does not contain a historic district / historic landscape.
- There are no known resources of traditional, religious, or cultural significance that might be part of a larger cultural landscape.

D.9.5 2016-2021 Management Actions

Table D-17. Cultural Resources Management Projects at Kalaeloa RC for FY 2016-2021.

Project #	Description	Status
	Consult with SHPD, NHOs, and stakeholders on proposed undertakings at Bldg 00282, 00117, 00663, and 00091 as necessary.	
	Consult with SHPD, NHOs, and stakeholders for any ground disturbing activities not covered in the Kalaeloa EA. Follow best management practices during ground disturbing activities and follow inadvertent discovery procedures for archaeological, historical, or cultural deposits and human remains.	

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D.10 RTI (15B05), Oahu

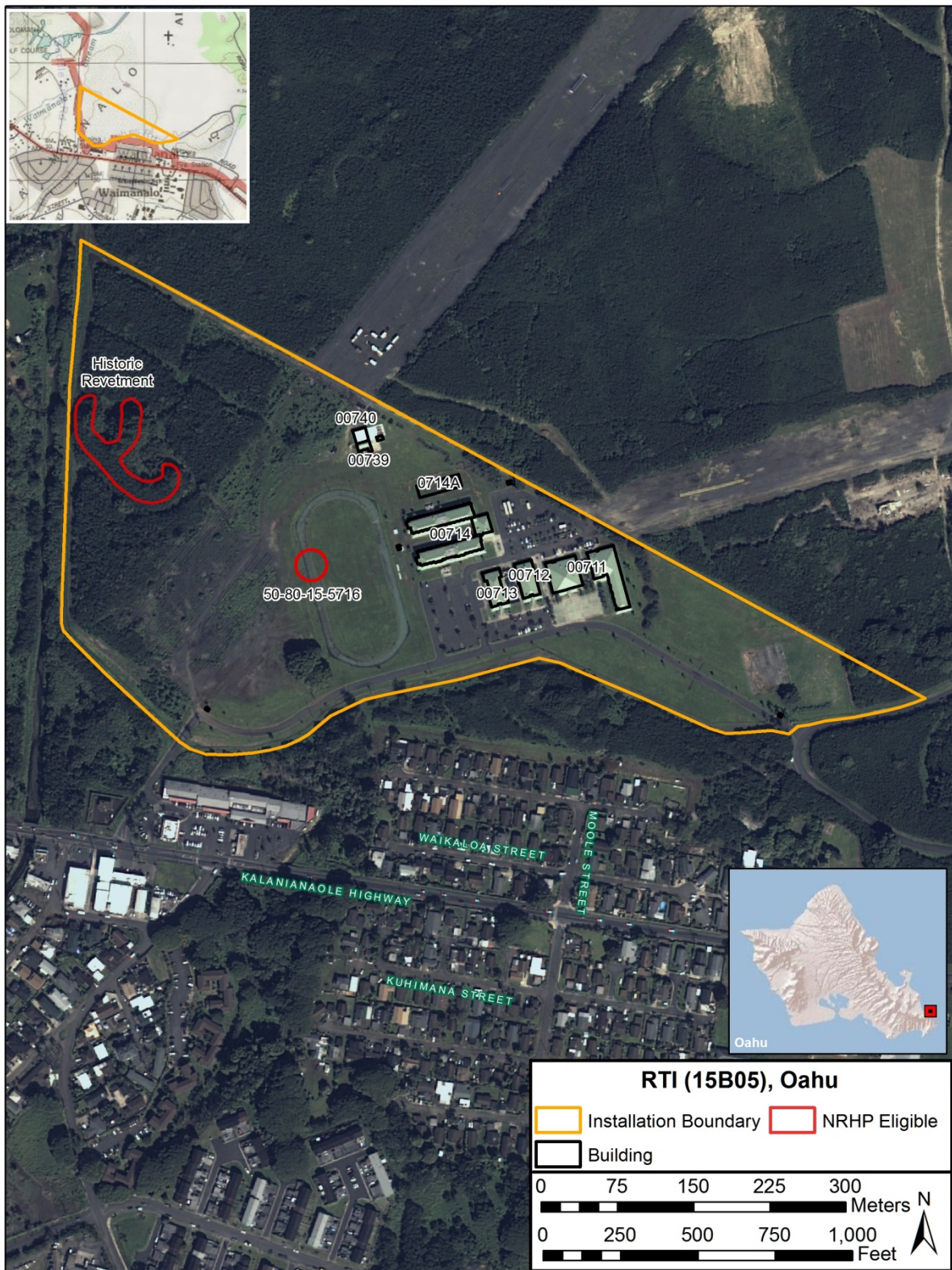


Figure D-17. RTI Cultural Resources.

District: Koolau-poko **County:** Honolulu **Town/Area:** Waimānalo

PRIDE Installation Code: 15B05

TMK: 4-1-01-50:01

Support: 100% Federal (US Marines; leased to HIARNG)

Total Acreage: 48 acres

D.10.1 Description and Background



Regional Training Institute (RTI) is located west of Waimanalo, on the Windward side of Oahu, 14 miles from Honolulu. The RTI consists of 48 acres within the southwest portion of Marine Corps Training Area Bellows (MCTAB). The RTI is located on a coastal plain at the base of the Koolau Mountain Range. The area sits atop a limestone reef, formed during a period of higher sea levels (HIARNG 1999 *In* INRMP 2012), however; the area was filled in the early twentieth century to facilitate on-ground military training and an airstrip. The airstrip was utilized by the Air Force during WWII but military air operations were halted in the late 1940s. The airstrip continued to be utilized for non-commercial aviation until the late 1950s. After the discontinued operation of the airfield, the Air Force constructed a communication facility at the southwestern tip of the airfield. The area was converted into the RTI in 2002 and now serves the HIARNG 298th Regiment Multi-Functional Training Brigade. The RTI consists of maintained grounds with five main buildings, used for classrooms and office space, two barracks, auditorium, mess hall, two guard shelters, and four sheds. These buildings were constructed after the HIARNG took control of the area in 2002.



In 1850, Thomas Cummins obtained a lease for 970 acres of Crown lands in Waimānalo (Topolinski c.1980: 4.). He ran cattle on the property, then raised racehorses and built a racetrack. His son converted the ranch to sugar after sugar became Hawaii's cash crop. He purchased cane from local Chinese farmers, built a

mill, and in 1877 created the Waimānalo Sugar Company (WSC).

Waimanalo Military Reservation was created on March 28, 1917 by Executive Order No. 2565. Comprised of 1,500 acres, the reservation served as a training camp, an infantry bivouac, a practice range for the Coastal Artillery, and as a practice bombing range for the Army Air Corps. A single asphalt runway, 75 ft. wide and 983 ft. long, was built on the reservation by 1928 (Territorial Aeronautical Commission 1928). In 1933, the reservation became Bellows Field in honor of Second Lt. Franklin B. Bellows of the 50th Aero Squadron, killed in action during World War I. Army air and ground forces used

Bellows for training and recreation, but few personnel were permanently stationed there. Bellows Field was established as a permanent military post July 22, 1941 (Farrell et al) and most facilities were constructed over the next two and a half years. Expansion began in March 1941, and by December 1941 the first long N/S runway was complete. Runway 6A, located on the south side of Waimānalo Stream, was extended to 2,200 ft (for a total 4,900 ft) to accommodate B-17 bombers. Facilities on the north side of Waimānalo Stream were complete by 1943. The field now had two runways; plane parking; two repair revetments at the north end of runway 18-36; numerous slot revetments constructed of earth and gunnite for fighter planes located at the southern end of runway 3L- 21R; and two taxiways connecting the runways by bridges over Waimānalo Stream.

Placed on caretaker status on 15 December 1948, the formal re-designation of Bellows Field as Bellows Air Force Base took place on March 26, 1948. The base remained on that status until 1951 when the Marines began using the base for training. The Air Force continues to use the back beach area as a recreational facility (Yoshishige, 1993). In 1961, the Army decided to augment air defense capabilities of the Hawaii Air National Guard's interceptor aircraft. Initial plans called for eight firing batteries of Nike-Hercules missiles at six different locations. The 112-acre Bellows launch site was built behind the beach at the southern end of Bellows; the permanent dual control site was located on Waimānalo Pali at the north end of Kamehameha Ridge (Farrell, et al 1997). Dedicated on 4 March 1961, this activity continued until December 9, 1969 when the HIARNG was relieved of its air defense mission (Adjutant General of Hawaii 1970; Stone 1961; von Hoften 1970: 108). The Oahu launch sites were entirely above ground in contrast to the CONUS operations that usually supplied underground magazines. In addition, Oahu Defense was totally a National Guard operation, thus the batteries were not permanently manned. Instead, HIARNG air defense technicians lived in off-base housing, going to their tactical sites for a 24-hour period when assuming hot status, or on drill weekend duty. The HIARNG activated a General Supply Company and a Light Maintenance Company on April 1 1970, and moved them onto the Nike site in June, 1970.

In 1987, HIARNG's Hawaii Military Academy moved to the Nike site administration area from Ft. Ruger (Farrell, et al 1997). Training and instruction consisted of officer candidates on drill weekends, military occupational specialty (MOS) training, and instructor development classes. Participants included Army National Guard and Reserve troops from Hawaii, Alaska, American Samoa, and Guam (Yoshishige, 1992).

D.10.2 Previous Studies

The RTI has been previously surveyed for cultural resources (Table 1) as part Bellows Air Force Station and the HIARNG RTI. Limited archaeological artifacts were located during the cultural surveys conducted between 1986 and 1997. In 1998, Tuggle and Dye conducted a cultural resources inventory survey, which included subsurface testing under the runway. The survey located a pre-contact cultural deposit (Site 50-80-15-5716) beneath the WWII runway fill and a WWII dual revetment. The survey recommended that both sites were eligible for listing on NRHP. The survey also concluded, based on archival research, that the western portion of the RTI was occupied during the 19th century; however, no subsurface testing was conducted in those areas. As a result of sensitive NAGPRA issues, and as part of Section 106 consultation, an ethnographic survey was conducted to supplement the 1998 survey, under the direction of OHA.

Waimānalo Ethnography- As part of an agreement between the Office of Hawaiian Affairs and the HIARNG, an ethnography regarding the use of the LCAs located on the RTI property by the Hawaiian owners after the Great Mahele distribution in 1848 was completed. During the development of the EA

and in conducting the inventory survey, OHA was concerned that this facet of the cultural landscape was being ignored. The Ethnographic survey for the HIARNG 298th Regional Training Institute (RTI) was completed in March of 2002. The objectives of the survey were to: identify and locate descendants of the original Land Commission Awards (LCAs) currently living in Waimānalo; to gather information about traditional cultural practices; and to gather information about pre-historic and historic cultural resources that may be affected by the implementation of the HIARNG 298th RTI development project. Unfortunately, the survey did not produce information that supported any of its objectives, and it concludes by stating the contributing factors that led to the dismal results. Based on archival and archaeological studies to date, the survey then recommends that cultural and archaeological monitoring take place for future undertakings at RTI, especially those that involve penetrating the sub-surface layers under the 22 feet of fill on the property and under the plow zone of the previous sugar cane fields, as evidence of pre-contact land use may be present. The survey also recommends that the “story” of the 298th RTI be written, to include the long, rich ancient history of the entire ahupuaa of Waimānalo.

Table D-6. Previous Surveys at RTI.

Authors	Date	Title
Hurlbett, Robert E. and Alan E. Haun	1987	Task Product 4: Cultural Resource Inventory, Evaluation, and Recommendations, Subtask 4a: Inventory and Evaluation, Cultural Resource Management Plan (CRMP), Bellows Air Force Station, Oahu, Hawai'i.
Hammatt, Hallett H. and David W. Shideler	1989	Archaeological Survey and Testing at Bellows Air Force Station for New Antennas and Trench Lines, Waimanalo, Ko'olaupoko, O'ahu.
Biosystems	1993	Cultural Resource Management Plan for Native Hawaiian Archaeological Resources, Bellows Air Force Station
Farrell, Nancy and Robert L. Spear	1997	Cultural Resources Management Plan (CRMP) for Bellows Air Force Station, Waimanalo, Ko'olaupoko, Island of O'ahu, Hawai'i.
Yoklavich, Ann and Spencer Leineweber	1997	Architectural Inventory and Evaluation of Pre-1950 Military Resources at Bellows Air Force Station, Oahu, Hawaii. Appendix F in N. Fmell and R.L. Spear, Cultural Resources Management Plan (CRMP) for Bellows Air Force Station, Waimanalo, Ko'olaupoko, Island of O'ahu, Hawai'i.
Tuggle, H. David and Tom Dye	1999	Cultural Resources Inventory Survey for the Hawaii Army National Guard Training Academy, Bellows Air Force Station, Waimanalo, Island of O'ahu, Hawai'i

D.10.3 Description of Cultural Resources

In the mid-1800's, livestock ranching and then the cultivation of sugar changed the valley floor, leaving little or no trace of former village life associated with the LCAs on the edge of Bellows. In the conversion to sugar, the kuleana and LCAs located at the southern end of the base were sold by their Hawaiian owners. These families then moved out of the area, and today many of the residents of present day Waimānalo are descendants of plantation workers from ethnic groups brought to Hawaii to work on sugar plantations.

Site 50-80-15-5716 - The cultural deposit is located under the current parade ground and track and beneath the WWII runway fill within the clay horizon, at approximately 240 cmbs. The deposit, as described by Tuggle and Dye (1999), is 25 cm thick and covers a 10 x 15 meter area. The deposit contained charcoal, basalt flakes, burned coral, and bone and marine shell fragments. The site was interpreted as a pre-contact agricultural deposit

B-17 Revetment- The B-17 Revetment, located in the western portion of the RTI, was constructed as one of twenty-one revetments built on Bellows Air Force Station in response to the Japanese attack on December 7, 1941. The revetments were personnel bunkers constructed of sand, coral, and gunnite consisting of two combined semi-circular opening, seven meters high, connected by a brick line tunnel. Yoklavich and Leinewber (1997) remarked, based on a WWII construction drawing, that the structures were “semi-octagonal, with an opening of 138 ft, a back wall width of 55 ft., a length of 88 ft., and a height of at least 20 ft” (Yoklavich and Leinewber 1997 *In* Tuggle and Dye 1999). The remains of the revetment consists of a personnel bunker and gun position (Tuggle and Dye 1999). No site number has been assigned to the revetment, however; this revetment was recommended to be eligible for the NRHP (Farrell et al, 1997).



Figure D-15. Current conditions of historic revetment at RTI.



Figure D-16. Panoramic photo of historic revetment, looking west



Figure D-18. 1948 aerial photo of Bellows, historic revetment at RTI circled (State of Hawaii 2014).

D.10.4 Cultural Resources Summary

- An Archaeological Monitoring Plan (AMP) for Bellows Regional Training Institute has been completed and archaeological monitoring zones have been created (Tuggle and Dye 1999).
- There are 48 acres at this installation, of which 48 acres has been surveyed for archaeological resources.
- One archaeological site has been located, and is eligible for listing in the NRHP.
- Of the 9 buildings and structures at this installation, including a historic WWII revetment, are currently 50 years old or older. The historic revetment structure is eligible for listing on the National Register under Criteria C and D.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This installation has not been surveyed to determine whether it includes a historic district / historic landscape.
- There are no known resources of traditional, religious, or cultural significance that might be part of a larger cultural landscape.
- This installation contains no cemeteries.

- D.10.5 2016-2021 Management Actions

Table D-7. Cultural Resources Management Projects at RTI for FY 2016-2021.

Project #	Description	Status
	Initiate project for preservation, maintenance, and treatment plan for the WWII historic revetment. Being worklines for the removal of invasive plant species.	
	Consult with SHPD, NHOs, and external stakeholders for any ground disturbing activities in archaeological sensitivity areas. Following the Archaeological Monitoring Plan in the 1998 AIS and follow SOPs.	
	Consult with SHPD, NHOs, and external stakeholders for any repairs, maintenance or modifications involving the historic WWII revetment.	
	Coordinate with FMO to include the WWII Revetment on PRIDE.	

D.11 Wahiawa RC (15A90/15A91), Oahu

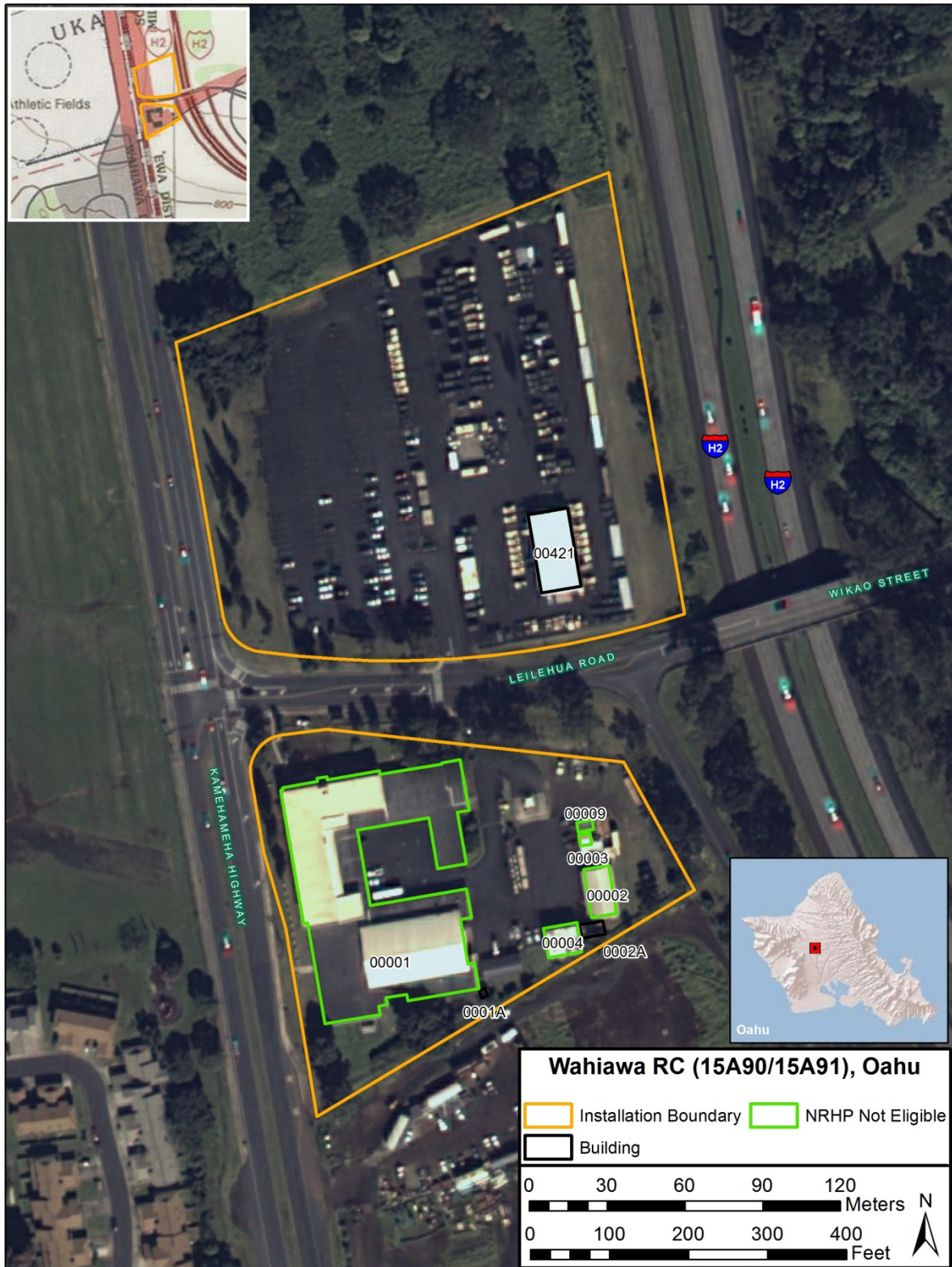


Figure D-18. Wahiawa RC Cultural Resources.

District: Ewa **County:** Honolulu **Town/Area:** Wahiawa
PRIDE Installation Code: 15A90/15A91
TMK #: 7 - 6 - 01: 02 (RC)
Support: State (RC-Four acres); Federal (Park and Ride-Six acres)
Total Acreage: 10 acres

D.11.1 Description and Background



The Wahiawa RC is located in central Oahu, south of the town of Wahiawa. The RC occupies 10 discontinuous acres, separated by Leilehua Road, and was established under a revocable permit with the Army in 1953. The region is known for pineapple and agricultural production and the site was directly adjacent to the railroad line. Since that time, the area has been heavily developed by the military and the construction of Kamehameha Highway and H2 Freeway. This facility consists of a five-unit RC, an MVS, an Operational maintenance shop (OMS) with the related infrastructure such as a wash platform, a classroom building,

sheds, and parking lots on either side of the Interstate H2 exit. Two cannons from Battery Huling at Ft. Ruger in Diamond Head Crater are mounted on the lawn in front of the RC.

The RC is set in the former Wahiawa agricultural district and was once the site of the Oahu Railway and Land Pine Spur Siding that connected the main line of the railroad from Waipahu to Wahiawa with a plantation camp to the east. A section camp, housing, water tanks, fuel tanks, and track yard were built in this area to serve the pineapple plantation. The area now known as Schofield Barracks and Wheeler Army Airfield was acquired by the federal government in 1909, however; the rail line served the military installation adjacent to the main route and wound around the newly built runways. The OR & L Wahiawa Branch Line served the military installation until its abandonment in 1947. Realignment of Kamehameha Highway and the building of the H2 freeway have obliterated any trace of the railroad ROW.

The HIARNG parcel was leased by the HIARNG from the federal government in 1953 and acquired the FMS vehicle maintenance shop and RC building. The FMS facility was shared with a trucking company during the beginning of the lease. Several other FMS structures were constructed in 1957. The buildup continued from with additional construction of the three-unit RC (1958) to house the three units of the 297th Anti Aircraft Artillery Battalion: HQ, HQ Battery, and Battery B. The RC is similar in design to many of the other armories built in Hawaii from standardized plans. The site was fenced off in 1965. Sometime later, the facility was expanded to become a five-unit RC and new offices and classrooms were added. A second story was added to the office/classroom wing north of the gym.

D.11.2 Previous Studies

E²M was contracted in 2009 to survey the Wahiawa RC; five buildings were surveyed to determine their eligibility for listing on the NRHP. The buildings surveyed include the Wahiawa Readiness Center (Building 001) and four Flammable Materials Storage facilities (Building 002, 003, 004, 009). All the buildings were determined ineligible for listing on the NRHP. Building 001 underwent considerable alterations in the 1990s while, Buildings 004 and 009 are not yet 50 years old and do not qualify for listing under Consideration G. The cultural landscape assessment found that the RC contained small rock walls but those did not constitute a wider historic landscape and thus was not eligible for NRHP listing.

The survey noted two cannons mounted on concrete caissons in front of the RC. The cannons were once mounted at Battery Huling at Ft. Ruger in Diamond Head crater. Battery Huling is a part of the Endicott phase of pre-WWI Hawaiian Sea Coast defense system constructed at Ft. Ruger and throughout the island to guard the Hawaiian Territory from enemy invasion prior to World War I (Allen and Shideler 1997). While these artifacts are not associated with Wahiawa RC and have been moved from their previous historic location, “a treatment should be developed to ensure proper maintenance...and ensure preservation” (E²M 2009)

No archaeological surveys were conducted prior to the construction of the facility.

Table D-20. Previous studies at Wahiawa RC.

Authors	Date	Title
engineering-environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation of Ten Facilities Hawaii Army National Guard

D.11.3 Description of Cultural Resources

No historic properties are located at this site. The extensive landform changes created by sugar and pineapple cultivation, the building of the railway depot, the realignment of Kamehameha Highway and Wheeler Army Air Base, and the construction of the RC has obliterated any prehistoric resources that may have been present at the facility.

Historic Cannons - Cannons from Battery Hullings displayed outside of Wahiawa RC and restored 1895 Cannon displayed in Bldg. 0001.



D.11.4 Cultural Resources Summary

- There are 10 acres at this site, of which 0 acres have been surveyed for archaeological resources.
- No archaeological sites have been located.
- Of the 9 buildings and structures at this site, 3 are currently 50 years old or older.
- 5 buildings and structures have been evaluated for listing in the NRHP. No buildings have been determined to be eligible. No buildings need further evaluation to make determination of eligibility for listing in the NRHP.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This site has been surveyed to determine whether it includes a historic district / historic landscape. The RC and surroundings were evaluated as not eligible for NRHP listing.
- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.11.5 2016-2021 Management Actions

Table D-21. Cultural Resources Management Projects at Wahiawa for FY 2016-2021.

Site/Installation	Project #	Description	Status
Wahiawa RC		Statewide management action for curation and interpretation of HIARNG collections will include cannons at Wahiawa. Maintain cannons at current level of preservation.	
		Notify SHPD, NHOs, and external stakeholders of ground disturbing activities. Follow best management practices during ground disturbing activities and follow inadvertent discovery procedures for archaeological, historical, or cultural deposits and human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	

D.12 Waiawa Gulch UTES and RTSM (15993/15891), Oahu

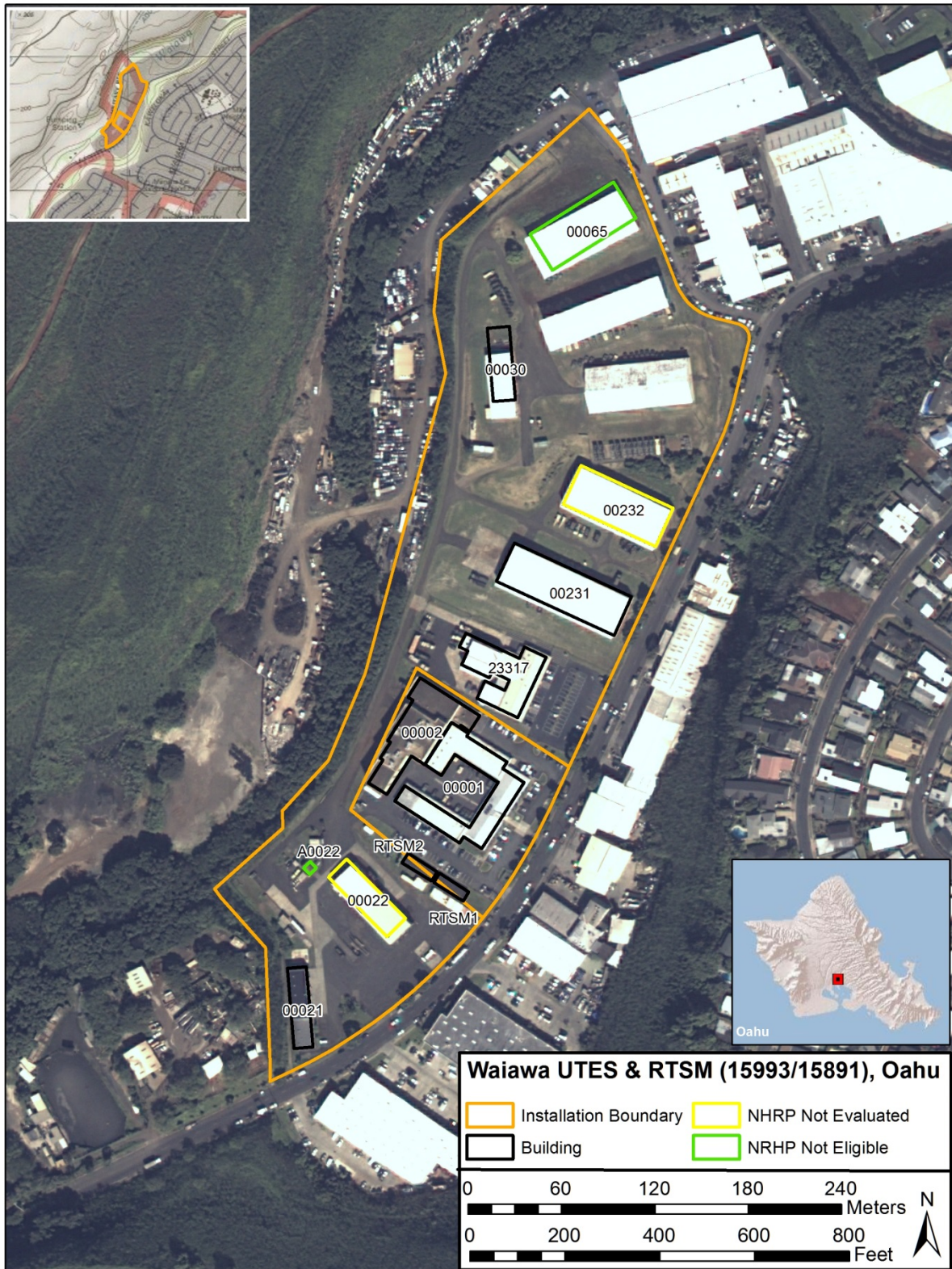


Figure D-19. Waiawa Gulch UTES & RTSM Cultural Resources.

District: Ewa **County:** Honolulu **Town/Area:** Pearl City
PRIDE Installation Code: 15993/15891
TMK #: 9 - 6 - 4: 15, 20 (State land)
Support: Federal (Army-19 acres) and State (RC-Three acres)
Total Acreage: 22 acres

D.12.1 Description and Background



The Waiawa Gulch Units Training Equipment Site (UTES) and Regional Training Sites Maintenance (RTSM) are located in Pearl City, north of Pearl Harbor and 13 miles northwest of Honolulu. The Waiawa Gulch UTES and RTSM are comprised of 22 acres, including the Pearl City site, surrounded by Naval Reservation and light industrial areas in Pearl City. The National Guard site is located on mixed-fill land, consisting of material dredged from the ocean, atop stony clay alluvium from erosion of the igneous rock. The UTES and RTSM consist of a 15.15-acre operational range, used as a wheeled vehicle driver's course, with the remaining 7.07-acres primarily used for the storage, maintenance, and training of HIARNG equipment and vehicles. The UTES and RTSM include a fueling area, a flammable materials storage building, a vehicle wash rack, a grease rack, an equipment loading dock, a UTES building, a motor vehicle storage building (MVSb), and a storage warehouse. All of the WWII buildings, except Bldg. 65

have either been demolished, upgraded, or replaced between 1976 and 1990. The RC was constructed in 1975.

The Naval Aviation Supply Depot at Waiawa Gulch (NASD Waiawa Gulch) was one of many supply depots built by the Navy in Hawaii in response to the tremendous need for additional storage facilities (to support military installations in Hawaii and in the South Pacific) following the Japanese attack in December of 1941. It was activated on July 31, 1944 and was one of three or four areas on Oahu, outside of the Naval Air Stations, specifically designated for aviation supplies.

The history of land tenure for Waiawa Valley can be traced to Princess Victoria Kamamalu, sister to Kings Kamehameha IV and V and niece of King Kamehameha III, who acquired a large portion of the Waiawa Valley area from Kamehameha III during the Great Mahele (the institution of Western-style land ownership) of 1848. Upon Kamamalu's death, her half-sister Princess Ruth Ke'elikolani inherited the land, which upon Ruth's death was given to her cousin, Bernice Pauahi Bishop. The land eventually became part of the Bishop Estate property. By 1943 many buildings had been constructed in the Waiawa area by the U.S. Navy, as they had obtained a lease or right of entry for the area. The Navy then acquired fee simple ownership, through condemnation proceedings, in August of 1945. After WWII there was not much of a need for the NASD storehouses, and in 1951 a map of the installation showed that it was designated "Inactive Status" and that it encompassed over 218 acres at that time. The Department of the Army requested a transfer of an aggregate 47.42 acres, and 36.837 acres of fee-

owned property, including buildings, were transferred to them by the Navy in 1959. In 1961 the Army reassigned custody and control of the 36.837 acres to the Hawaii Army National Guard. The buildings and improvements on the land at the time consisted of six Warehouses, one Equipment maintenance shop, an Administration Building, an Equipment Storage Warehouse, a Latrine and Storage Building, utilities, and a perimeter road. In 1969, a 14.62-acre portion was disposed of (sold to a private development company) by the General Services Administration, reducing the installation to 22.22 acres. The HIARNG RC was then built in 1971. In 1972, the U.S. Army considered three acres surrounding the RC as excess so they sold it to the State of Hawaii in fee simple, leaving the U.S. Army with a remaining 19.22 acres. In 1975, the State of Hawaii, via Executive Order No. 2768, set aside the three acres purchased from the Army for HIARNG purposes. Finally, in 1987 the Army granted the State an indefinite license to use and occupy their remaining 19.22 acres in Waiawa for HIARNG activities. In 1961, when the HIARNG took over Waiawa, their acreage included 10 buildings. Six of those WWII constructed buildings continue to be used into the 21st century. Only the Administration Building, the Latrine and Storage Building, and two warehouses have been demolished.

The Waiawa facility name has changed over time, however its mission remains the same: to provide vehicle and equipment storage, organizational maintenance and support, and training for the various HIARNG tenants at the facility. The name changed from Waiawa Field Training Concentration Site (FTCS) in the 1960's to Waiawa Annual Training Equipment Pool (ATEP) or Annual Field Training Equipment Pool (AFTEP) in the 1970's. By 1979, the name had changed to Waiawa Mobilization and Training Equipment Site (MATES). Finally, in 1999, the name changed to Waiawa Gulch UTES & RTSM.

D.12.2 Previous Studies

In 2002, Mason Architects conducted a HABS documentation of Building 22. The report included historic contexts and architectural descriptions for six of the naval warehouses as well as damage assessments. The report assessed the significance and integrity of each facility. Five buildings (0013, 0022, 0025, 0028, 0065) were recommended as eligible for listing on the national register, however; no formal determinations of eligibility were made.

In 2009, E²M was contracted to survey five buildings located on Waiawa Gulch UTES & RTSM and conduct a cultural landscape assessment of the site. The company found that two buildings, recommended as eligible for listing on the NRHP in 2002, were since demolished. E²M surveyed three buildings (0013, 0025, 0065) as part of their contract. All three buildings were found to be eligible for listing on the NRHP under Criteria A and C as a significant district within the north end of the property. Building 0065 is the only building from the group that remains standing after high winds destroyed Buildings 0013 and 0025 in 2011.

No prehistoric surveys have been conducted on the HIARNG site however; an *inventory level survey* of the parcel adjacent to the facility revealed no prehistoric sites, only a concrete lined main water ditch which is a remnant of the historic Waiawa sugar cane complex. An archaeological monitoring plan was created for the removal and disposal of contaminated soils (HIARNG 2006). The archaeological monitoring plan for the proposed soil removal areas was approved by SHPD in 2006 and later expanded to approve the plan for archaeological monitoring accross the entire 22 acre facility in 2011 (SHPD 2006, 2011). The propsed contaminated soil removal and disposal projects did not constitute an adverse effect to any historic structures located at Waiawa Gulch UTES & RTSM (SHPD 2006, 2011).

HDR, Inc. conducted a historic building survey and NRHP evaluation at five HIARNG installations. HDR surveyed 27 facilities, 45 years and older at Kekaha WETS and Hanapepe RC on Kauai, Ft. Ruger, and Waiawa Gulch UTES & RTSM on Oahu, and KMR on Hawaii. Fieldwork was completed in March 2014 and following consultation with SHPD, the final report was completed in December 2014 (Blackwell and Barnes 2014).

Table D-22. Previous studies at Waiawa.

Authors	Date	Title
Blackwell and Barnes	2014	Final Historic Building Survey and Evaluation Report at Five Facilities Hawaii Army National Guard
engineering-environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation of Ten Facilities Hawaii Army National Guard
HIARNG Environmental	2006	Archaeological Monitoring Plan for Removal and Disposal of Contaminated Soils from Waiawa Gulch Unit Training Equipment Site, Island of Oahu, Hawaii.
R. Spencer Mason Architects, Inc	2002	<i>HABS Documentation for Building 22, Waiawa Gulch UTES</i>

D.12.3 Description of Cultural Resources

Building 0065 is the only extant building of the three historic buildings at Waiawa Gulch UTES & RTSM that remains standing after high winds destroyed Buildings 0013 and 0025 in 2011. The grouping of the three buildings was a major contributing element to the buildings' significance and NRHP eligible status. With the loss of Buildings 0013 and 0025, the integrity and significance of the building grouping has been negatively affected and compromised the NRHP eligibility of Building 0065. An NRHP eligibility assessment and determination should be made for Building 0065, in consultation with SHPD; however, this task is beyond the scope of this ICRMP. There are no known prehistoric cultural resources present on the facility, however, archaeological monitoring is recommended for intrusive subsurface excavations for soil contamination projects (soil borings, monitoring wells, test units, and soil removal and disposal across the installation (SHPD 2011).

D.12.4 Cultural Resources Summary

- There are 22 acres at this site, an unknown portion of the area was surveyed by Sinoto (1997) for archaeological resources.
- No archaeological sites have been located.
- 2 buildings and structures have been evaluated for listing in the NRHP. No buildings have been determined to be eligible. 2 buildings (Bldg 22 and Bldg 28) need further evaluation to make determination of eligibility for listing in the NRHP.

- In consultation with SHPD assess and determine NRHP eligibility of one remaining historic building.
- This site has been surveyed to determine whether it includes a historic district / historic landscape.
- This site does not lie within a local historic district.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.12.5 2016-2021 Management Actions

Table D-23. Cultural Resources Management Projects at KMR for FY 2016-2021.

Site/ Installation	Project #	Description	Status
Waiawa Gulch UTES & RTSM		Notify SHPD, NHOs, and external stakeholders of ground disturbing activities. Implement the AMP (HIARNG 2006) for intrusive subsurface investigations related to soil contamination projects across the installation (SHPD 2011). Follow best management practices during ground disturbing activities and follow inadvertent discovery procedures for archaeological, historical, or cultural deposits and human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries. Assess and determine NRHP eligibility of Building 0065 in consultation with SHPD.	

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D.13 Wheeler Army Air Field (15A95), Oahu



Figure D-20. WAAF Cultural Resources.

District: Ewa **County:** Honolulu **Town/Area:** Wahiawa
PRIDE Installation Code: 15A95
TMK: 7-7-01: 02
Ownership: 100% Federal (US Army-leased to HIARNG)
Total Acreage: 31 acres

D.13.1 Description and Background



Wheeler Army Air Field (WAAF) is located in central Oahu and borders Schofield Barracks Main Post to the northwest. The WAAF consists of 1369 acres however; the HIARNG occupies a small 31-acre parcel north of the airstrip. The area has been heavily developed since the establishment of the air field in 1922. Prior to the airfield, the land was used for agricultural purposes. The soils of the area are arable. The HIARNG utilizes six buildings under a revocable license with the U.S. Army. The HIARNG no longer utilizes portions of historic Hangars 110 and 113.

In the early historic period, the area now known as WAAF provided sandalwood and range for cattle ranching. These lands were classified as Crown and government lands, and were turned over to the military in the early 1900's. Initially named the Hawaiian Divisional Air Service Flying Field, the airfield was renamed in 1922. Wheeler Field's mission was to meet the increasing needs for facilities to support planes used by the U.S. Army's Hawaiian Department. In 1939, Wheeler Field officially became a permanent Army post separated from Schofield Barracks. It suffered heavy damage during the attack on Pearl Harbor on December 7, 1941. After the attack, a new round of construction began, resulting in two new runways and support facilities. Wheeler Field became obsolete soon after WWII, with the introduction of jet aircraft, and was transferred to the Air Force and renamed Wheeler Air Force Base, and then deactivated a short time later. Reactivated during the Korean War, the base was shared by the Air Force, Navy, Army, and the Air National Guard (Tomonari-Tuggle 2000). In 1977, property management responsibilities were turned over to the Army, and in 1987, portions of the base were designated a National Historic Landmark. The Army formalized the takeover of the base from the Air Force in 1991 and renamed to Wheeler Army Air Field, and the base is now home to the Hawaii Air National Guard's Hawaiian Regional Operational Coordination Center (HROCC). Many of Wheeler Field's original buildings have been rehabilitated and are of historical interest as part of the historic district.

D.13.2 Previous Studies

International Archaeological Research Institute Inc (IARII) and Spencer Mason Architects prepared a complete cultural resource assessment of Wheeler Army Air Field in January 1994 for Belt Collins and Associates. An Army CRMP incorporating the data from the assessment and proposed management protocols for the Wheeler Army Air Field Historic District was prepared in April 2000 by Belt Collins Hawaii with Mason Architects and IARII, for the Army Corp of Engineers (Contract DACA83-95-D-0018, Delivery Order 0006).

Table D-24. Previous studies at WAAF.

Authors	Date	Title
R. Spencer Mason Architects, Inc	1994	<i>Historic Building Survey in "Schofield Barracks Real Property Management Plan"</i>
Tomonari-Tuggle	2000	Wheeler Army Airfield Cultural Resources Management Plan.

D.13.3 Description of Cultural Resources

The HIARNG previously held a lease for Hangars 110 and 113. The hangars are considered historic, however; the HIARNG no longer has holdings in these buildings. There are no other buildings that are considered historic at WAAF. Due to extensive landform changes at the beginning of the historic period and continuing through the 1940's, there are no prehistoric resources located within the HIARNG facilities.

D.13.4 Cultural Resources Summary

- There are 31 acres at this site, of which 0 acres have been surveyed for archaeological resources.
- No archaeological sites have been located.
- Of the 5 buildings and structures at this site, none are currently 50 years old or older.
- No buildings and structures have been evaluated for listing in the NRHP.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This site has not been surveyed to determine whether it includes a historic district / historic landscape.
- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.13.5 2016-2021 Management Actions

Table D-25. Cultural Resources Management Projects at WAAF for FY 2016-2021.

Site/ Installation	Project #	Description	Status
WAAF		Notify SHPD, NHOs, and external stakeholders of ground disturbing activities. Follow best management practices during ground disturbing activities and follow inadvertent discovery procedures for archaeological, historical, or cultural deposits and human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	

D.14 Hanapepe Readiness Center (15A05), Kauai

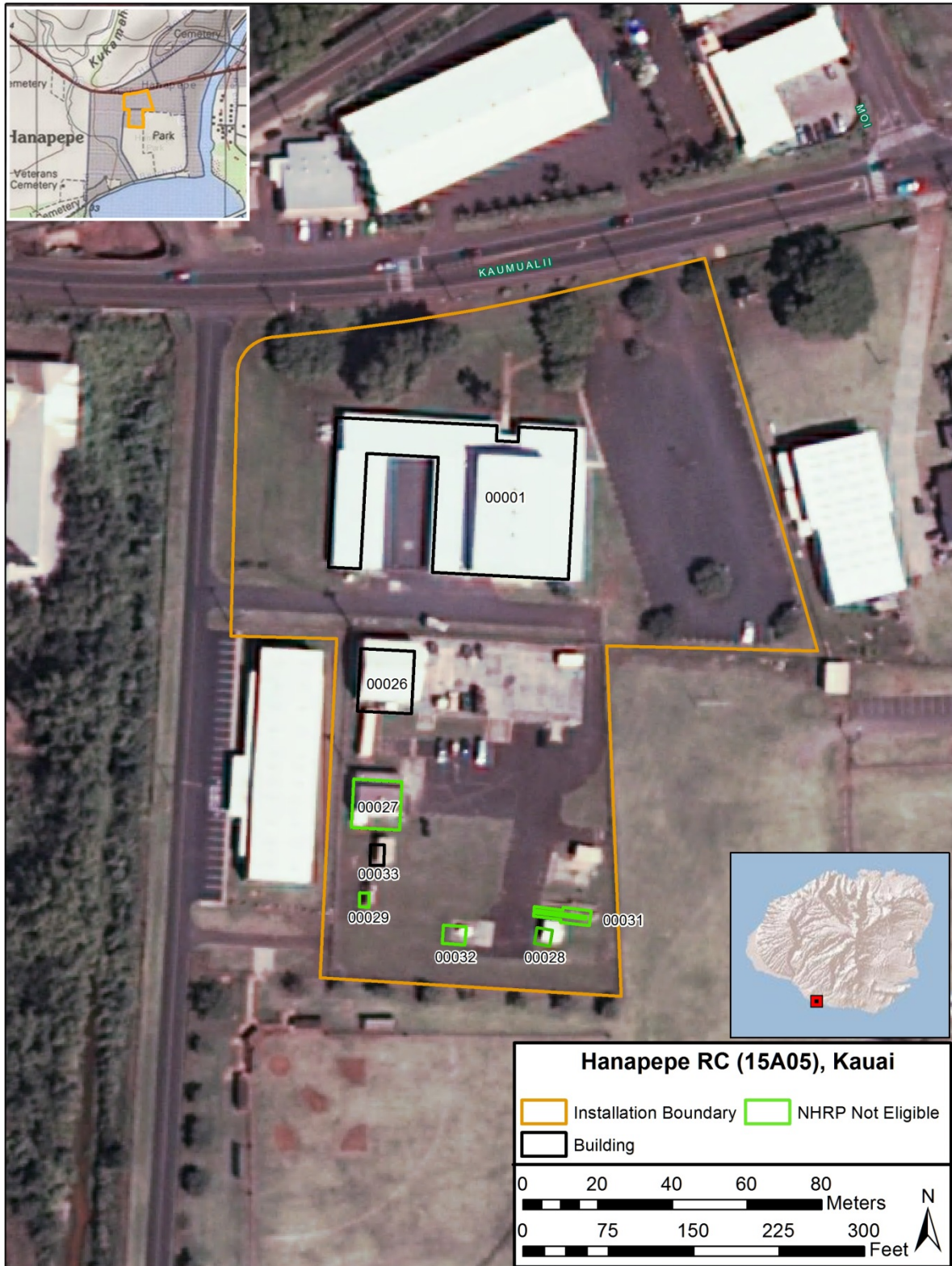


Figure D-21. Hanapepe RC Cultural Resources.

District: Waimea **County:** Kauai **Town/Area:** Hanapepe
Pride Installation Code: 15A05
TMK #: 1-8-08: 77 & 78
Support: Federal & State
Total Acreage: 3.28 acres

D.14.1 Description and Background



Hanapepe RC is a 3.28-acre site located on the southwest coast of Kauai, on the west end of the town of Hanapepe. The site is near the convergence on Hanapepe Valley River and Hanapepe Bay on the coastal plain. The area has been extensively graded and filled, as evidenced by the adjacent park and cemetery, however; the RC sits on arable land. The Hanapepe RC includes 7 buildings consisting of the RC, maintenance shop, and storage facilities.

The RC land was acquired in 1937 was acquired from the US Navy as part of the HIARNG build-up on Kauai. The original RC was constructed in 1939 to house the 298th and the 299th Infantry Regiments of the National Guard (Creed and Hammatt) that protected Burns Field (the only paved landing field on Kauai in 1941) and Port Allen. The regiments were also assigned at Hanapepe to protect the new field at Lihue under the command of LTC Eugene Fitzgerald. The original RC was a warehouse constructed in 1930 and was used several times as part of evacuation efforts for Kauai residents. In 1968 the RC was federally activated in response to the Vietnam War. An Organizational Maintenance Shop (OMS #5) was constructed in 1969 to support these efforts. The original RC was replaced with a one-unit RC replaced the original RC in 1988.

D.14.2 Previous Studies

E²M was contracted to survey one structure (Building 0029) and conduct a cultural landscape assessment of the HIARNG RC. Building 0029 was constructed prior to 1963 made of hollow tile block and slab. The building has a gabled—roof supported by metal trusses with corrugated metal used as roofing material. The building is currently used for flammable material storage. E²M found that while the building retains historic integrity, historic associations with other prominent buildings have been lost. An associated warehouse blew down in 1982 during Hurricane Iwa and the original RC was replaced due to termite damage in 1990. Building 0029 was determined not eligible for listing on the NRHP. The survey also found “no cultural landscape was found to be present at the Hanapepe RC, predominantly due to the lack of historic features with associations” (E²M 2009).

HDR, Inc. conducted a historic building survey and NRHP evaluation at five HIARNG installations. HDR surveyed 27 facilities, 45 years and older at Kekaha WETS and Hanapepe RC on Kauai, Ft. Ruger, and Waiawa Gulch UTES & RTSM on Oahu, and KMR on Hawaii. Fieldwork was completed in March 2014 and following consultation with SHPD, the final report was completed in December 2014 (Blackwell and Barnes 2014). Three facilities (00028, 00031, and 00032) were surveyed and recommended as not eligible for listing in the NRHP.

No previous *archaeological survey* has been conducted on the property; however areas adjacent to the facility have been assessed. Investigations consisted of a *subsurface inventory level survey* (Creed and Hammatt 1995) and *inadvertent discoveries of human burials* on properties adjacent to the facility. The facility lies near the ocean on ancient sand dunes, a prime burial area for ancient Hawaiians particularly on Kauai. Background research indicates that disturbance during the building of the Hanapepe facility leaves little to no *in situ* prehistoric cultural remains.

Table D-26. Previous studies at Hanapepe RC.

Authors	Date	Title
Blackwell and Barnes	2014	Final Historic Building Survey and Evaluation Report at Five Facilities Hawaii Army National Guard
engineering- environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation of Ten Facilities Hawaii Army National Guard

D.14.3 Description of Cultural Resources

No prehistoric properties present. No historic properties present.

D.14.4 Cultural Resources Summary

- There are 3.28 acres at this site, of which 0 acres have been surveyed for archaeological resources.
- No archaeological sites have been located.
- Of the 7 buildings and structures at this site, 4 are currently 50 years old or older.
- Four buildings have been evaluated for listing in the NRHP. No buildings have been determined to be eligible. No buildings need further evaluation to make determination of eligibility for listing in the NRHP.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This site has been surveyed to determine whether it includes a historic district / historic landscape. No historic district/historic landscape is present.
- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.14.5 2016-2021 Management Actions

Table D-27. Cultural Resources Management Projects at Hanapepe for FY 2016-2021.

Project #	Description	Status
	Notify SHPD, NHOs, and external stakeholders of ground disturbing activities. Follow best management practices during ground disturbing activities and follow inadvertent discovery procedures for archaeological, historical, or cultural deposits and human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	

D.15 Kapaa RC (15A40), Kauai



Figure D-22. Kapaa RC Cultural Resources.

District: Kawaihau **County:** Kauai **Town/Area:** Kapaa

Pride Installation Code: 15A40

TMK #: 4-5-15: 05

Support: 100% State

Total Acreage: 2.5 acres

D.15.1 Description and Background



Kapaa RC is located west of the town of Kapaa on the eastern side of the island of Kauai. The RC is surrounded by a residential area and municipal parks. The area, once part of a marshland, has been heavily graded and filled with other soils. The facility contains a One-Unit RC and a Motor Vehicle Storage Building (MVS), a Flammable Materials Storehouse (FMS), and two smaller buildings. The facility is fenced and lies on the Kapaa flood plain behind the town of Kapaa.

Permanent settlement occurred along the coast throughout late prehistory as indicated by the presence of thick cultural deposits in the shore and backshore areas of Kapaa, and these layers have been dated by radiocarbon methods to as early as the 14th century. Through archaeology and other sources, at one time agricultural and domestic activities extended into the far mauka areas of Kapaa, but were abandoned by the mid-19th century. Early records of the Kapaa area (1840's) show that only six individuals owned land parcels in Kapaa. Five of the six had *lo'i*, or irrigated kalo (taro) fields on the mauka (mountain) side of the lowland marsh area (since filled in), which sometimes extended up into the small, shallow gulches and valleys of the area. Each owner also had a separate house lot located on the makai (ocean) side of the marsh, adjacent to the beach. At the time, the residential village of Kapaa did not exist as a single entity, but consisted of a series of most likely small settlements or compounds which stretched along the shoreline of the ahupuaa. The sugar industry arrived in Kapa'a in 1877 with the establishment of the Makee Sugar Company and construction of a sugar mill near the north end of the present town. Cane was primarily cultivated in the upland areas and Chinese rice farmers successfully cultivated the lowlands of Kapaa. Several Hawaiian kuleana owners leased or sold their parcels mauka of the marsh land to rice cultivators. The economic activity as a result of the successful sugar and rice ventures eventually led to the sale of the house lot kuleana lands on the makai side of the marsh for increasing commercial and residential development.

D.15.2 Previous Studies

E²M was contracted to survey the RC (Building 001) and 5 associated outbuildings (Buildings 002-006) as well as conduct a cultural landscape assessment. The RC, built in 1957, was determined to be of statewide significance due to its association as one of four one-unit armories constructed in Hawaii between 1957 and 1961. The four National Guard facilities were constructed to maintain military readiness, associated with the Cold War, and domestic disaster response. The RC was constructed as part of the Federal RC Construction Program. The plans for construction were altered by the Army Corps of Engineers to accommodate Hawaii's climate. The survey found that the RC retained high levels

of integrity of materials, workmanship, location, setting, feeling, and association and was determined eligible for listing on the NRHP under Criterion A and C.

The outbuildings buildings (002-006) are associated with the Kapaa RC, however; only three are permanent structures and only one was evaluated for eligibility for listing on the NRHP under the four criteria due to the others lacking sufficient age. Building 003, the flammable materials storage shed, was built in 1963. The building was constructed of concrete block on concrete slab with a corrugated gable roof. Due to its lack of association with the historic RC, the structure was determined ineligible. The remaining buildings, constructed in 1967, 1970, and 1988, respectively, were assessed for significance under Consideration G for Cold War Associations. Neither the motor vehicle storage shelter (Building 002), wood-frame shelter (Building 003), storage shed (Building 004, field kitchen and mess (Building 005), or the Hazardous Materials Storage Facility were recommended as eligible for listing under this consideration. E²M's cultural assessment found that although the facility also contained a garden memorial for Kauai guardsmen who fell in Vietnam that contributed to the overall setting of the RC, only Building 003 had significant age to contribute to a cultural or historic landscape. No historic or cultural landscape exists at this site.

Archaeological site reports for the area reveal that no subsurface reconnaissance or inventory surveys have been conducted on or near the facility.

Table D-28. Previous studies at Kapaa.

Authors	Date	Title
engineering-environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation of Ten Facilities Hawaii Army National Guard

D.15.3 Description of Cultural Resources

Building 001 the Kapaa RC was designed in 1957 by the Department of Public Works, Territory of Hawaii and built by Ichiji Matsumura (E²M 2009). The RC is a steel frame, hollow tile block structure with an large open area under a medium pitch gable roof. The RC is one of three one-unit armories built in 1957 (Figure 4-116). The other two were constructed at Olaa (now Keaau), Hawaii and Kahului, Maui, and used the same architectural plans as the Kapaa RC. The primary façade is a recessed porch entrance with a simple parapet above. According to the 2009 survey:



There are no known prehistoric resources on this facility.

D.15.4 Cultural Resources Summary

- There are 2.5 acres at this site, of which 0 acres have been surveyed for archaeological resources.

- No archaeological sites have been located.
- Of the 3 buildings and structures at this site, 2 are currently 50 years old or older.
- 2 buildings and structures have been evaluated for listing in the NRHP. 1 building has been determined to be eligible for the NRHP. No buildings need further evaluation to make determination of eligibility for listing in the NRHP.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This site has been surveyed to determine whether it includes a historic district / historic landscape. While the individual landscape features contribute to the overall setting of the RC, collectively they do not hold significance as a cultural landscape.
- This site does not lie within a local historic district.
- NHOs have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.15.5 2016-2021 Management Actions

Table D-29. Cultural Resources Management Projects at Kapaa RC for FY 2016-2021.

Project #	Description	Status
	Consult with SHPD, NHOs, and stakeholders on proposed undertakings at Bldg. 0001.	
	Consult with SHPD, NHOs, and stakeholders under HRS Chapter 6E for ground disturbing activities. Follow during ground disturbing activities and follow inadvertent discovery procedures for archaeological, historical, or cultural deposits and human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	

D.16 Kekaha WETS (15A65), Kauai

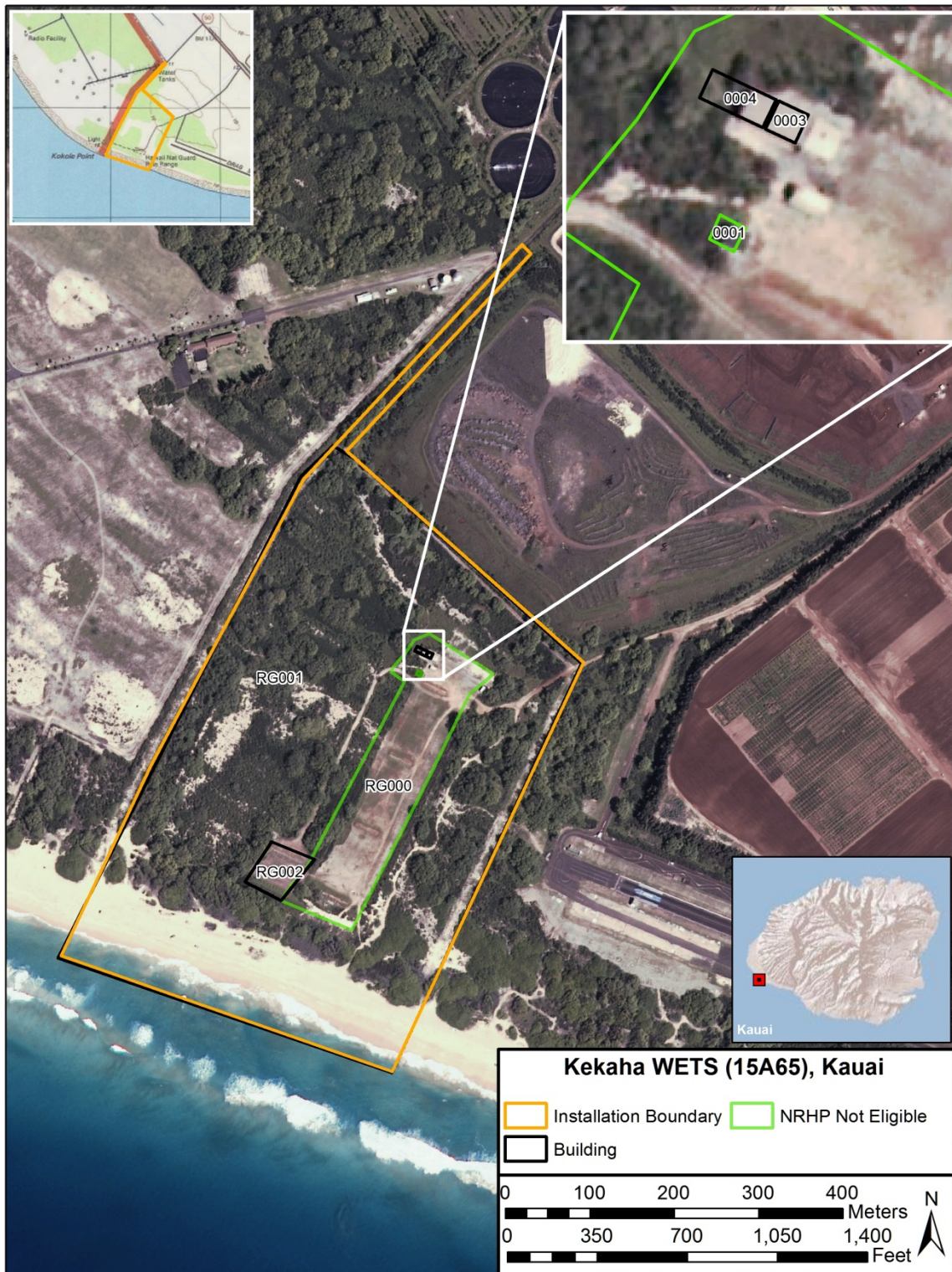


Figure D-23. Kekaha WETS Cultural Resources.

District: Waimea **County:** Kauai **Town/Area:** Kekaha
Pride Installation Code: 15A65
TMK #: 1-2-02: 21
Support: 100% State
Total Acreage: 68 acres

D.16.1 Description and Background



Kekaha WETS is located on the Mana Plain on the southwest coast of Kauai, west of Kekaha town and Kekaha Beach. The 68-acre parcel is also adjacent to the US Navy Pacific Missile Range Barking Sands. The Mana Plain is dominated by calcareous sands along the coast with a terrigenous alluvium from the valleys within the inland portions. The beach ridge provided a barrier from the sea, creating a shallow lagoon and marshland. The firing range area was converted in the nineteenth-century for agricultural use by draining and filling in the lagoon. The US Army took over portions of the plain, including the 68-acre parcel

between 1940 and 1941 as part of the Mana Airport Military Reservation. HIARNG acquired the property in 1957. The parcel was converted into a firing range. A single latrine (Bldg 00002), constructed in 1960, and two unknown structures are located on the range.

D.16.2 Previous Studies

An archaeological inventory survey was conducted in 1994 (Polk and Hammatt) on HIARNG Kekaha WETS. The survey included a pedestrian survey of the entire property and subsurface testing. Testing found natural sand under imported top soil. No cultural resources were located in the project area or within the testing trenches. No further archaeological study was recommended for the HIARNG site.

Engineering-environmental Management Inc (E²M) conducted a historic building survey of Kekaha WETS in 2009. The survey found that Bldg 00001, a combined toilet shower, was the only building on the range, was substantially altered and did not hold any significant historic associations. The building was recommended as ineligible for NRHP listing. The survey also conducted a Cultural Landscape Assessment of the range. E²M (2009) noted “portions of the landscape are certainly old, if not older than the 1961 latrine...no other information was located...to document when certain features were constructed.” The survey noted that the area was kept aside for National Guard use in 1948 however; further research was recommended to evaluate significance as a cultural landscape.

HDR, Inc. conducted a historic building survey and NRHP evaluation at five HIARNG installations. HDR surveyed 27 facilities, 45 years and older at Kekaha WETS and Hanapepe RC on Kauai, Ft. Ruger, and Waiawa Gulch UTES & RTSM on Oahu, and KMR on Hawaii. Fieldwork was completed in March 2014 and following consultation with SHPD, the final report was completed in December 2014 (Blackwell and Barnes 2014).

HDR evaluated Kekaha WETS Known Distance (KD) Range #0 (RG000) and found it to be significant as a cultural landscape at the local level under Criteria C and eligible for the Hawaii Register of Historic Places (HRHP), but does not have the national significance to be NRHP eligible (Blackwell and Barnes, 2014).

Table D-30 Previous Studies at Kekaha WETS.

Authors	Year	Title
Folk and Hammatt	1994	Archaeological Inventory Survey and Subsurface Testing at the Hawaii National Guard Firing Range at Kekaha, Kauai
engineering-environmental Management, Inc.	2009	Final Historic Buildings Survey and Evaluation Report of Ten Facilities Hawaii Army National Guard
Blackwell and Barnes	2014	Final Historic Building Survey and Evaluation Report at Five Facilities Hawaii Army National Guard

D.16.3 Description of Cultural Resources

There is one historic resource present on the facility. There are no known prehistoric cultural resources present on the facility.

D.16.4 Cultural Resources Summary

- There are 68 acres at this site, of which 68 acres has been surveyed for archaeological resources.
- No archaeological sites have been located.
- Of the 6 buildings and structures at this site, 3 are currently 50 years old or older.
- 2 buildings and structures have been evaluated. No buildings have been determined to be eligible. No buildings need further evaluation to make determination of eligibility for listing in the NRHP.
- No buildings and structures will turn 50 years old over the life of this ICRMP.
- This site has been surveyed to determine whether it includes a historic district / historic landscape (E²M 2009).
- This site does not lie within a local historic district although further research was recommended (E²M 2009).
- This site contains a cultural landscape KD Range #0 (RG000), significant at the local level under Criteria C and eligible for the HRHP, but not significant at the national level and not eligible for the NRHP (Blackwell and Barnes 2014).
- There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

D.16.5 2016-2021 Management Actions at Kekaha WETS

Table D-31. Cultural Resources Management Projects at Kekaha for FY 2016-2021.

Site/Installation	Project #	Description	Status
Kekaha WETS		Consult with SHPD, NHOs, and external stakeholders under HRS Chapter 6E for ground disturbing activities. Follow best management practices during ground disturbing activities and follow inadvertent discovery procedures for archaeological, historical, or cultural deposits and human remains. Consult with SHPD, NHOs, and burial council as needed for inadvertent discoveries.	

D.17 HIARNG Building, Structures & Cultural Sites Data

D.17.1 Installation Building/Structure Data

The building maps and information provided in Appendix D is taken from the Real Property Support Plan generated by the Facilities Management Office, Real Property Technician. The Real Property Technician updates the Real Property Support Plan quarterly based on updated PRIDE data. The Cultural Resources Manager inputs relevant data from the Real Property Support Plan, which does not include utilities or linear structures. The CRM will update the Real Property data and installation maps listed in the ICRMP annually. Two historic properties are not listed in the Real Property Support Plan: The WWII Revetment at RTI and the WWII building remnants at Puunene. Both sites are captures in Table D-33.

**Table D-32. Building Inventory & Historic Status as of NOV 2014
(Real Property Support Plan NOV 2014, Historic Eligibility)**

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
Keaau RC: Site 15A55					
1	Administrative Gen Purpose Bldg	1/1/1957	1/1/2007	2009	Yes
2	Flammable Material Storehouse	1/1/1985	1/1/2035		
3	Flammable Material Storehouse	1/1/1986	1/1/2036		
4	Storage Shed	1/1/1957	1/1/2007	2009	No
Kealahou RC: Site 15A60					
1	NG Readiness Center	1/1/1961	1/1/2011	2009	Yes
2	Org Str Bldg	1/1/1949	1/1/1999	2009	Yes
3	Organizational Classroom	1/1/1949	1/1/1999	2009	No
4	DEMOED			2009	Yes
6	Land Vehicle Fueling Tank	1/1/1979	1/1/2029		
7	HAMAT Building	7/26/2002	7/26/2052		
002A	Flammable Material Storage	8/26/2011	8/26/2061		
KMR: Site 15A10					
3	Enlisted UPH, across AFRC / KMR Cottage	1/1/1950	1/1/2000	2006	Yes
419	Flammable Materials Storehouse / CSMS#2 HAZMAT Storage	8/17/1998	8/17/2048		
420	Flammable Materials Storehouse / CSMS#2 HAZMAT Storage	2/24/1999	2/24/2049		
421	Flammable Materials Storehouse / HHT/ RSTA HAZMAT Storage	7/26/2002	7/26/2052		
501	CSMS/MATES / CSMS#2 Veh Maintenance Shop	1/1/1942	1/1/1992	2006	No
502	Vehicle Maintenance Shop / CSMS#2 Veh Maintenance Shop	1/1/1956	1/1/2006	2006	No
505	Exchange Branch / PX AAFES	1/1/1942	1/1/1992	2006	No
507	Controlled Humidity Warehouse / CHP #3 Warehouse	1/1/1942	1/1/1992		

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
509	Org Classroom / ORG Classroom	1/1/1942	1/1/1992	2006	No
522	Indoor Firing Range / Indoor Firing Range	1/1/1955	1/1/2005		
556	Controlled Humidity Warehouse / CHP #1 Warehouse	1/1/1942	1/1/1992		
557	Controlled Humidity Warehouse / CHP #2 Warehouse	1/1/1942	1/1/1992		
620	Org Str Building / Org Storage Bldg				
621	Company HQ's Bldg / Transient Training Bldg	1/1/1955	1/1/2005	2006	No
622	Org Str Building / HHT, S-4 Org Storage Bldg	1/1/1956	1/1/2006	2006	No
623	Separate Toilet/Shower Building	1/1/1942	1/1/1992	2006	No
624	Storage Shed / KMR Quonset Hut	1/1/1942	1/1/1992	2006	No
625	Storage GP / DAGS Storage GP	1/1/1949	1/1/1999	2006	No
626	Admin Gen Purp / DAGS Admin Bldg	1/1/1942	1/1/1992	2006	No
628	NG Vehicle Maintenance Shop / CSMS #2 ARNG Veh Main	1/1/1954	1/1/2004	2006	No
629	General Item Repair Shop / CSMS #2 Welding	1/1/1954	1/1/2004	2006	No
630	Flammable Material Storehouse / CSMS #2 FMB Pol	1/1/1957	1/1/2007	2006	No
631	Flammable Material Storehouse / CSMS #2 FMB Paint	1/1/1954	1/1/2004	2014	No
633	Range Operations and Storage Building / KD1 Range Ops and Storage	1/1/1987	1/1/2037	2014	No
634	Separate Toilet/Shower Building	1/1/1953	1/1/2003	2014	No
636	Range Operations and Storage Building / KD1 Range Ops and Storage	1/1/1953	1/1/2003	2014	No
638	Range Operations and Storage Building / KD2	1/1/1953	1/1/2003	2014	No
640	Range Operations and Storage Building / RG006	1/1/1953	1/1/2003	2014	No
641	Proposed CSMS #2 Bldg				
643	ARNG/USAR Center / AFRC Armed Force Reserve Center	2/23/2011	2/23/2061		
644	Flammable Material Storage / AFRC_HIARNG/USAR Flam Stor	2/23/2011	2/23/2061		
660	CSMS/MATES / CSMS#2	10/8/2005	10/8/2055		
661	Engineering/Housing Maint. Shop	2/23/2011	2/23/2061		

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
662	TT ENL Barracks / YCA Barracks				
663	TT ENL Barracks / YCA Barracks				
909	Underground Storage Facility / ENV Storage Bunker	1/1/1953	1/1/2003	2014	No
910	Underground Storage Facility / ENV Storage Bunker	1/1/1953	1/1/2003	2014	No
911	Underground Storage Facility / Unit Storage Bunker	1/1/1953	1/1/2003	2014	No
912	Ammunition Storehouse / Ammo Storage Bunker	1/1/1953	1/1/2003	2014	No
622A	Flammable Material Storehouse / HHT 1-299th Flam Mat Stor	1/1/1956	1/1/2006	2006	No
622E	Or Str. Bldg / HHT 1-299th Organizational Storage	1/1/1989	1/1/2039		
643F	ARNG Veh Main & USAR / ARFC Vehicle Maintenance Bldg	2/23/2011	2/23/2061		
644A	Rear of Bldg 643F Veh Main Bldg / AFRC HAZMAT	2/23/2011	2/23/2061		
CC001	KMR Obstacle Course	7/7/2011	7/7/2061		
CTA01	Covered Training Area / Range Covered Training				
CTA02	Covered Training Area / Range Covered Training				
CTA03	Covered Training Area / Range Covered Training				
MOUT1	Live-Fire Exercise Shoot House / KMR Shoot House				
RG001	Known Distance Range / KD Range #1	1/1/1941	1/1/1991	2014	No
RG002	Known Distance Range / KD Range #2	1/1/1941	1/1/1991	2014	No
RG003	Combat Pistol/MP Firearms/ KMR Pistol Range	1/1/1941	1/1/1991	2014	No
RG004	Impact Area Dudded / Grenade Impact Area	1/1/1941	1/1/1991		
RG005	Maneuver/Training Area	1/1/1941	1/1/1991		
RG006	Automatic Rifle Range / Assault Rifle Range	1/1/1941	1/1/1991	2014	No
Hilo AASF#2: Site 15A12					
617	Storage / AASF#2 Storage Building				
618	Old Aircraft Maintenance Hangar / AASF#2 AC Main Hangar	9/3/1986	9/3/2036		
619	Storage GP / AASF#2 Storage building	4/10/2001	4/10/2051		
620	Aircraft Maintenance Hangar / AASF#2 Maint Hangar	9/3/1986	9/3/2036		

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
621	Storage General Purpose Building / AASF#2 Storage Bldg	9/1/2011	9/1/2061		
622	Storage General Purpose Building / AASF#2 Storage Shed	9/1/2011	9/1/2061		
672	Aircraft Maintenance Hangar / AASF#2 Maint Hangar	4/10/2001	4/10/2051		
RELO1	Flammable Material Storehouse / FMS	9/1/2011	9/1/2061		
Puunene RC: Site 15B10					
1	NG Readiness Center	4/12/2003			
2	NG Vehicle Maintenance Shop	4/12/2003			
3	Flammable Material Storehouse	4/12/2003			
Ukumehame WETS: Site 15A67					
3	Range Operations & Storage Building	8/16/2011	8/16/2061		
RG001	Combat Pistol/MP Firearms	1/1/1960	1/1/2010		
RG002	Known Distance Range	1/1/1990	1/1/2040		
RG003	Maneuver/Training Area	1/1/1990	1/1/2040		
Kaunakakai RC: Site 15A50					
1	NG Readiness Center	1/1/1995	1/1/2045		
2	Vehicle Storage Building	1/1/1939	1/1/1989	2009	No
4	Flammable Material Storehouse	1/1/1981	1/1/2031		
6	Grease Rack	1/1/1950	1/1/2000	2014	No
7	Organizational Storage Building	1/1/1989	1/1/2039		
RELO1	Flammable Material Storage	3/17/2010	3/17/2060		
Fort Ruger : Site 15A20					
90	Engineering/Housing Maintenance Shop	1/1/1942	1/1/1992	2009	No
00M0	Underground Storage Facility / Tunnel Storage (HIENG)	1/1/1906	1/1/1956	2009	Yes
00M1	Underground Storage Facility / Tunnel Storage (HIENG)	1/1/1906	1/1/1956	2009	Yes
00M2	Underground Storage Facility / Tunnel Storage (HIENG)	1/1/1906	1/1/1956	2009	Yes
00M3	Underground Storage Facility / Tunnel Storage (HIENG)	1/1/1906	1/1/1956	2009	Yes
00M4	Underground Storage Facility / Tunnel Storage (HIENG)	1/1/1906	1/1/1956	2009	Yes
00M5	Underground Storage Facility / Tunnel Storage (HIENG)	1/1/1906	1/1/1956	2009	Yes
00M6	Underground Storage Facility / Tunnel Storage (HIENG)	1/1/1906	1/1/1956	2009	Yes
300	Admin General Purpose / Counter Drug/J1 Staff/R&R	1/1/1960	1/1/2010	2009	Yes
301	Ready Bldg / CERF-P	1/1/1962	1/1/2012	2009	Yes
303	Admin Building / State Civil Defense	1/1/1964	1/1/2014	2014	Yes

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
304	CSMS / CSMS #1 ARNG Maint Shop	1/1/1964	1/1/2014	2014	Yes
306	Admin Building / Hawaii DoD	1/1/1978	1/1/2028		
407	Underground Admin Facility / POMSO/EOC	1/1/1906	1/1/1956	2009	NRL-C
90C	NG Vehicle Maintenance Shop	1/1/1966	1/1/2016	2009	No
90D	NG Vehicle Maintenance Shop	1/1/1953	1/1/2003	2009	No
90E	Separate Toilet/Shower Building	1/1/1967	1/1/2017		
90F	Flammable Material Storehouse	1/1/1971	1/1/2021		
90J	Installation Storage / State Storage	11/23/2009	11/23/2059		
90K	Installation Storage / State Storage	11/23/2009	11/23/2059		
90L	Installation Storage / State Storage	11/23/2009	11/23/2059		
90M	Installation Storage / State Storage	11/23/2009	11/23/2059		
90N	Installation Storage / State Storage	11/23/2009	11/23/2059		
00HUL	Underground Storage Facility / SCD Storage Facility	1/1/1906	1/1/1956	2009	NRL-C
300A	Admin Gen Purpose	1/1/1906	1/1/1956	2009	Yes
303A	Flammable Material Storehouse / SCD Flam Mat Stor	1/1/1964	1/1/2014	2014	No
303C	Water Storage Building	11/23/2009	11/23/2059		
304A	Maintenance Shop / CSMS #1 Canvas Repair	1/1/1964	1/1/2014	2014	No
304D	Maintenance Shop / CSMS #1 Carpenter Shop	1/1/1966	1/1/2016	2014	No
304E	Battery Shop	1/1/1964	1/1/2014	2014	No
304F	Storage Shed / Bldg 304 CSMS #1	1/30/2012	1/30/2062		
304G	Storage Shed / Bldg 304 CSMS #2	1/30/2012	1/30/2062		
306A	NG Readiness center	1/1/1978	1/1/2028		
306B	HIANG Federal Credit Union	11/9/2009	11/9/2059		
306C	Storage Water Building	11/23/2009	11/23/2059		
0DODG	Inst Storage Other Than/State Civil Defense Storage	1/1/1906	1/1/1956	2009	NRL-C
0HAR1	Underground Storage Facility / Battery Harlow	1/1/1906	1/1/1956	2009	NRL-C
0VAUL	Underground Storage Facility / State Civil Defense UNG Storage Facility	1/1/1906	1/1/1956	2009	Yes
EOC01	Emergency Operations Center / State of Hawaii Do, EOC	11/23/2009	11/23/2059		
MULE0	Underground Storage Facility / Mule Tunnel Storage	1/1/1906	1/1/1956	2009	NRL-C
Kalaeloa RC: Site 15001					
19	Readiness Center / JFHQ, HHD Readiness Center	9/1/1953	9/1/2003	2009	No

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
29	Readiness Center / 29th IBCT Readiness Center (TBA)				
30	Aircraft Maintenance Hangar / AASF#1 AC Maint Hangar (TBA)				
46	NG Readiness Center / Med Det Readiness Center	9/1/1957	9/1/2007	2009	No
91	Organization Storage / Org Storage Bldg 2d Fl	9/1/1960	9/1/2010	2009	Yes
116	Controlled Humidity Warehouse / Kalaeloa FMS #1 CHP	3/19/2008	3/19/2058		
117	Administrative Building / Multi Purpose Building	9/1/1944	9/1/1994	2009	Yes
118	Flammable Material Storehouse / 29th BSTB Flam Mat Str (RELO)	9/29/1999	9/29/2049		
129	Organizational Storage Bldg / Org Storage Bldg				
134	Ready Building / 93rd CST Ready Building	8/9/2005	8/9/2055		
140	Recreational Shelter / 29th BSB/BSTB Pavillion	1/1/1999	1/1/2049		
175	Info. System Processing Center / HIARNG Mail Dist. Center	9/1/1960	9/1/2010	2009	No
182	Fueling/Pol/Wash Support Bldg / Pol Bldg	9/1/1952	9/1/2002	2009	No
200	Flammable Material Storehouse / 29th BSB Flammable Storage (RELO)	9/18/2000	9/18/2050		
202	Flammable Material Storehouse / 29th BSB A & C/Co Flammable Storage	9/18/2000	9/18/2050		
204	Flammable Material Storehouse / FMS #1 Flammable Storage (RELO)	7/26/2002	7/26/2052		
206	Flammable Materials Storehouse / CSMS #1 Flammable Storage (RELO)	7/26/2002	7/26/2052		
282	NG Readiness Center / Kalaeloa Readiness Center	9/1/1958	9/1/2008	2009	Yes
537	Organizational Storage Bldg / BDE Quonset Hut	9/1/1944	9/1/1994	2009	No
609	Ready Magazine / Ready Mag Inst	9/1/1944	9/1/1994	2009	No
663	Organizational Storage Building / FMS #1	9/1/1943	9/1/1993	2009	Yes
116A	Controlled Humidity Warehouse /29th CHP Bldg	7/29/2011	7/29/2061		
117A	Storage General Purpose / USPFO Central Issue Facility	7/5/2012	7/5/2062		
1676	Fueling/Pol/Wash Support Bldg / Pol Bldg	9/1/1963	9/1/2013	2009	No

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
1784	Administrative Building / HIARNG Staff Bldg	9/1/1963	9/1/2013	No	
1785	Administrative Building / HIARNG HQ Bldg	9/1/1963	9/1/2013	No	
1786	Enlisted Barracks / YCA	9/1/1973	9/1/2023		
1787	Enlisted Barracks / YCA	9/1/1973	9/1/2023		
1788	Administrative Building / HIARNG HQ Conf. Room	9/1/1973	9/1/2023		
1874	Administrative Building / Seafarers Bldg	9/1/1982	9/1/2032		
1875	Administrative Building / Admin Bldg	9/1/1981	9/1/2031		
1898	NG Readiness Center / HQ 29th IBCT Readiness Center	9/1/1986	9/1/2036		
1903	Admin General Purpose / FMO & ENV Admin Office	9/1/1985	9/1/2035		
RTI: Site 15B05					
711	Administration Building	10/22/2002	10/22/2052		
712	Dining Facility	10/22/2002	10/22/2052		
713	Auditorium	10/22/2002	10/22/2052		
714	Transient UPH / Army Lodging	10/22/2002	10/22/2052		
736	Recreation Shelter / RTI Pavillion	10/22/2002	10/22/2052		
739	Storage Shed	7/26/2002	7/26/2052		
740	Storage Shed	7/26/2002	7/26/2052		
714A	General Instruction Building	12/6/2012	12/6/2062		
Wahiawa RC: Site 15A90					
1	NG Readiness Center	1/1/1958	1/1/2008	2009	No
2	NG Vehicle Maintenance Shop	1/1/1958	1/1/2008	2009	No
3	Flammable Material Storehouse	1/1/1959	1/1/2009	2009	No
4	NG Vehicle Maintenance Shop	1/1/1973	1/1/2023	2009	No
9	Flammable Material Storehouse	8/11/1997	8/11/2047	2009	No
14	Organizational Storage Building				
0001A	Storage Shed GP / Wash Rack Storage Shed	7/19/2011	7/19/2061		
0002A	Storage Shed GP / FMS #2 Storage GP	7/19/2011	7/19/2061		
Wahiawa Park & Ride: Site 15A91					
421	Controlled Humidity Warehouse	4/25/2006	4/25/2056		
Waiawa - Pearl City : Site 15891					
1	NG Readiness Center / HHD, 103rd Trp Cmd & 1-299th CAV	1/1/1974	1/1/2024		

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
2	Band Training Bldg / 111th Army Band/230th Eng	1/1/1995	1/1/2045		
Waiawa Gulch UTES & RTSM: Site 15993					
21	NG Vehicle Maintenance Shop / UTES Maintenance Shop/Office	1/1/1978	1/1/2028		
22	NG Vehicle Maintenance Shop / UTES Maintenance Shop/Bay	1/1/1943	1/1/1993	No	
28	Controlled Humidity Warehouse / UTES CHP	1/1/1943	1/1/1993	No	
30	Storage Building / UTES Metal Storage Bldg	1/1/1989	1/1/2039		
32	Flammable Material Storehouse / UTES HAZMAT Bldg	8/11/1997	8/11/2047		
34	Flammable Material Storehouse / UTES HAZMAT Bldg	2/24/1999	2/24/2049		
35	Flammable Material Storehouse / UTES HAZMAT Bldg	9/29/1999	9/29/2049		
36	Flammable Material Storehouse / UTES HAZMAT Bldg	9/29/1999	9/29/2049		
37	Flammable Material Storehouse / UTES HAZMAT Bldg	9/29/1999	9/29/2049		
38	Organizational Storage Bldg / HHD, TC Org Storage Bldg				
65	Vehicle Storage Building / UTES Mil Vehicle Storage Bldg	1/1/1943	1/1/1993	2009/2014	No
231	Vehicle Storage Building / UTES Vehicle Storage Bldg	7/29/2005	7/29/2055		
23317	General Instruction Bldg / RTSM Regional Training Site Maintenance	1/1/1995	1/1/2045		
A022	Flammable Material Storehouse / UTES Flammable Storage Bldg	1/1/1962	1/1/2012	2014	No
RTSM1	Administrative Building / 117th MPAD Admin Bldg	1/1/1993	1/1/2043		
RTSM2	Admin Gen Purp / 297th Fire Fighters & HHD, 103d Admin	1/1/1993	1/1/2043		
WAAF: Site 15A95					
825	AC Maintenance Hangar& Admin Bldg	1/16/2001	1/16/2051		
827	Flammable Material Storehouse	1/1/1976	1/1/2026		
829	Aircraft Maintenance Hangar	1/1/1976	1/1/2026		
832	NG Readiness Center	1/1/1984	1/1/2034		
834	Organizational Storage Building				
Hanapepe RC: Site 15A05					
1	NG Readiness Center / Hanapepe Readiness Center	1/1/1990	1/1/2040		
26	Vehicle Storage Shed /FMS #5	1/1/1983	1/1/2033		

Building No.	Building/Structure RPA Name	Built Date	50 Year Old Date	Surveyed	Eligible
27	NG Vehicle Maintenance Shop / Hanapēpē FMS #5 Veh Maint Shop	1/1/1978	1/1/2028		
28	Flammable Material Storehouse / FMS #5 Flammable Material Storage	1/1/1963	1/1/2013	2014	No
29	Flammable Materials Storehouse / FMS #5 Flammable Materials Storage	1/1/1952	1/1/2002	2009	No
31	Grease Rack / Hanapēpē FMS #5 Grease Rack	1/1/1952	1/1/2002	2014	No
32	Land Vehicle Fueling Str. Tnk. / FMS #5 Lan Vehicle Fueling	1/1/1961	1/1/2011	2014	No
33	Flammable Materials Storehouse / FMS #5 HAZMAT Storage (RELO)	8/17/1998	8/17/2048		
Kapaa RC: Site 15A40					
1	Admin General Purpose/ State DoD Admin Building	1/1/1957	1/1/2007	2009	Yes
3	Flammable Material Storehouse	1/1/1963	1/1/2013	2009	No
4	Storage Shed	1/1/1988	1/1/2038		
Kekaha WETS: Site 15A65					
1	Separate Toilet/Shower Building	1/1/1961	1/1/2011	2009	No
3	Range Operations & Storage Building	9/7/2011	9/7/2061		
4	Covered Training Area	9/7/2011	9/7/2061		
RG000	Known Distance Range	1/1/1957	1/1/2007		
RG001	Maneuver/Training Area	7/17/1957	7/17/2007		
RG002	Combat Pistol/MP Firearms	1/1/1995	1/1/2045		

D.17.2 HIARNG Cultural Sites & Historic Collections Data

The CRM will update the known cultural sites and historic structures data annually. This table reflects the total acreage of each HIARNG installation as well as how many acres have been surveyed for cultural resources and/or historic structures.

Table D-33. Cultural Sites/Historic Structures Listed By Facility Cultural Sites Listed by Facility

Description	State Site Number	Management Plan / SOP	NRHP-eligible
Keaau RC: Site 15A55		Acreage: 3	Acreage Surveyed: 0
Historic Cemetery from 1880-1890's believed to be Chinese workers from Ola'a Sugar Co., currently contains 50+ gravesites	X	Not on HIARNG Property. Preservation by avoidance.	?
Kealahou RC: Site 15A60		Acreage: 4.25	Acreage Surveyed: 0
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
KMR: Site 15A10		Acreage: 509	Acreage Surveyed: 509
Historic Puna Trail/Old Government Road	50-10-35-18869	The lack of integrity due to modern changes to the trail within KMR reduce its significance and no preservation stipulations are recommended	Eligible under Criterion D
A remnant portion of the Puna Trail and two agricultural planting features.	50-10-35-23273	The remnant portion of the trail is considered eligible under Criterion D. The ag features are not eligible	Eligible under Criterion D
C-shaped Military Gun Emplacement	50-10-35-21657	This modern artillery position is significant under Criterion D of the National Register.	Eligible under criterion D
Five Rock Ahu or mounds parallel to the pre-historic Puna Trail	50-10-35-21658	Preservation by avoidance	Eligible under Criterion D
Possible Horse Stable, ag pits, waystation for workers of the Old Government Road/Puna Trail expansion	50-10-35-21771	Preservation by avoidance	Eligible under Criterion A,C and D
A modified lava tube measuring 40 ft. by 13 ft. used a possible recurrent shelter.	50-10-35-30008	No further work as per the recommendations in the 2014 Archaeological Inventory Survey by CSH.	Eligible under Criterion D
A modified lava tube and temporary habitation site.	50-10-35-30009	No further work as per the recommendations in the 2014 Archaeological Inventory Survey by CSH.	Eligible under Criterion D

Description	State Site Number	Management Plan / SOP	NRHP-eligible
A complex of mounds, pits and enclosures likely representing a late 19th century activity area with temporary habitation and agricultural pits associated with the Puna Trail.	50-10-35-30010	No further work as per the recommendations in the 2014 Archaeological Inventory Survey by CSH.	Eligible under Criterion D
A constructed rock wall and possible agricultural pit that likely dates to the late 19th century Puna Trail improvements.	50-10-35-30011	No further work as per the recommendations in the 2014 Archaeological Inventory Survey by CSH.	Eligible under Criterion D
A 50 ft. long remnant portion of the Puna Trail.	50-10-35-30012	No further work as per the recommendations in the 2014 Archaeological Inventory Survey by CSH.	Eligible under Criterion D
A 70 ft. portion of the pre-historic Puna Trail.	50-10-35-30038	Preservation by avoidance.	Eligible under Criterion D
A 23 ft long terraced wall, possibly used as an activity center or temporary habitation area.	50-10-35-30216	No further work as per the recommendations in the 2014 Archaeological Inventory Survey by CSH.	Eligible under Criterion D
A low rock wall and mound, possibly used for Hawaiian agricultural practices.	50-10-35-30217	No further work as per the recommendations in the 2014 Archaeological Inventory Survey by CSH.	Eligible under Criterion D
Hilo AASF#2 : Site 15A12 Acreage: 8 Acreage Surveyed: 0			
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	
Puunene RC: Site 15B10 Acreage: 30 Acreage Surveyed: 26.85			
Concrete Tablet	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	
WWII concrete pads and structures	50-50-09-4164	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	

Description	State Site Number	Management Plan / SOP	NRHP-eligible
Ukumehame WETS: Site 15A67		Acreage: 39.28	Acreage Surveyed: 0
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
Kaunakakai RC: Site 15A50		Acreage: 2.52	Acreage Surveyed: 0
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
Ft Ruger: Site 15A20		Acreage: 325	Acreage Surveyed: 325
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
Kalaeloa RC: Site 15001		Acreage: 147	Acreage Surveyed: 43.6
Numerous Sinkholes/Groundvoids surveyed in 2012 by CSH. All determined not significant.	X	Phase I Archaeological Survey in 2012	N/A
RTI: Site 15B05		Acreage: 48	Acreage Surveyed: 40
Hawaiian pre-contact agricultural layer 240cm below ground, in an area approx. 10 by 15m. It contains (6) basalt flakes, charcoal, burned coral, and fragments of marine shell and bone	50-80-15-5716	Archaeological monitoring should be conducted during construction activities near this site. See AMP in 1999 Archaeological survey.	Eligible under Criterion D
the WWII dual revetments used for B-17 bombers are distinctive building types and part of the defensive response to the Japanese attack of December 7, 1941.	Historic Structure	The revetment should be preserved, maintained and considered for adaptive reuse	Eligible under Criterion C and D

Description	State Site Number	Management Plan / SOP	NRHP-eligible
Wahiawa RC: Site 15A90		Acreage: 10	Acreage Surveyed: 0
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
Waiawa Park & Ride : Site 15993		Acreage: 22	Acreage Surveyed: 0
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
WAAF: Site 15A95		Acreage: 31	Acreage Surveyed: 0
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
Hanapepe RC: Site 15A05		Acreage: 3.28	Acreage Surveyed: 0
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
Kapaa RC: Site 15A40		Acreage: 2.5	Acreage Surveyed: 0
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A
Kekaha WETS: Site 15A65		Acreage: 68	Acreage Surveyed: 68
None	X	Personnel/Soldiers/Contractors to hire an archaeologist to monitor all digging activities on undisturbed ground, until an Archaeological Inventory Survey has been completed	N/A

Table D-34. HIARNG Historic Collections Listed By Facility

Description	State Site Number	Management Plan / SOP	NRHP-eligible
KMR: Site 15A10			
2 - 47mm Japanese Model 1 antitank guns from 1941. Designed for towing behind a Jeep, mounted on split-rail trailers	X	Funding for preservation, maintenance and display of historical collections to come from the PAO as per NGR 870-20 and NGB Guidance. Units or FMO to coordinate necessary maintenance of cannons with the PAO.	
Kaunakakai RC: Site 15A50			
Molokai Cannon	X	Funding for preservation, maintenance and display of historical collections to come from the PAO as per NGR 870-20 and NGB Guidance. Units or FMO to coordinate necessary maintenance of cannons with the PAO.	
Wahiawa RC: Site 15A90			
Two cannons from Battery Hulings are mounted in front of the Armory. These cannons are a part of the Endicott phase of pre-WWI Hawaiian Sea Coast defense system.	X	Funding for preservation, maintenance and display of historical collections to come from the PAO as per NGR 870-20 and NGB Guidance. Units or FMO to coordinate necessary maintenance of cannons with the PAO.	
Wahiawa Cannon			

APPENDIX E

AGREEMENT DOCUMENTS

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**PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL EMERGENCY MANAGEMENT AGENCY,
THE HAWAII STATE HISTORIC PRESERVATION OFFICER,
THE STATE OF HAWAII DEPARTMENT OF DEFENSE, AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**

WHEREAS, the Federal Emergency Management Agency (FEMA), incorporated into the Department of Homeland Security, Emergency Preparedness and Response Directorate, assists States, communities, and other eligible entities with disaster housing; hazard mitigation; prevention of and preparedness for emergencies and disasters; and the repair, restoration and replacement of public infrastructure (Programs), pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. §§ 5121-5206) (Stafford Act), the National Flood Insurance Act of 1968, as amended (42 U.S.C. § 4001 et seq.), and implementing regulations in Title 44 of the Code of Federal Regulations (44 CFR); and

WHEREAS, FEMA has determined that implementation of the Programs may affect properties in the State of Hawaii listed in or eligible for the National Register of Historic Places (National Register) (historic properties), and has consulted with the Hawaii State Historic Preservation Officer (Chairperson, State of Hawaii, Department of Land and Natural Resources) (SHPO), and the Advisory Council on Historic Preservation (ACHP), pursuant to 36 CFR Part 800, the regulations implementing Sections 106 and 110(f) of the National Historic Preservation Act (16 U.S.C. 470f and 470h-2) (NHPA); and

WHEREAS, FEMA has determined that implementation of the Programs may affect historic properties with religious and cultural significance to Native Hawaiian organizations. FEMA has notified the Office of Hawaiian Affairs (OHA) about this Programmatic Agreement (Agreement), and will consult with OHA to identify Native Hawaiian organizations that may participate in the terms of this Agreement to help fulfill the requirements of Section 106; and

WHEREAS, as a result of a Presidentially declared Emergency or Disaster (Disaster), the State of Hawaii will receive financial and technical assistance from FEMA, and in turn will provide assistance to qualified applicants to alleviate the effects of the Disaster, and as such the State of Hawaii Department of Defense, State Civil Defense (SCD), will be responsible for administering the Programs, has participated in this consultation, and has been invited to execute this Agreement; and

WHEREAS, the signatories agree that implementation of the Programs will be more effective if, pursuant to 36 CFR § 800.14(b), an Agreement is established to: specify procedures, roles, and responsibilities in the historic review process; eliminate further SHPO and ACHP review of certain routine activities with little potential to adversely affect historic properties; and promote efficiency so that the effects of the Programs on historic properties are considered while delays to FEMA's delivery of disaster assistance are minimized;

NOW, THEREFORE, FEMA, the SHPO, SCD, and ACHP agree that the Programs will be administered pursuant to the following Stipulations to satisfy FEMA's Section 106 responsibilities for all of its Undertakings, and effectively integrate historic preservation considerations with the needs of FEMA's Undertakings. FEMA will not fund any Undertaking until it is reviewed pursuant to this Agreement.

STIPULATIONS

To the extent of its legal authority and in coordination with the SHPO, SCD, and ACHP, FEMA will require that the following Stipulations be implemented:

I. LEAD AGENCY COORDINATION

FEMA, when determined to be the Lead Agency, will coordinate the Section 106 activities of any other Federal agencies that participate in an Undertaking related to FEMA Programs. FEMA will resolve any disputes among signatory or consulting parties to this Agreement, according to the terms of this Agreement.

II. APPLICABILITY

This Agreement applies to all FEMA Programs for every past, present, or future Disaster, through December 31, 2015 [Stipulation XIII. A. Duration]. If agreed to otherwise in writing by FEMA, the SHPO, and ACHP, this Agreement may be suspended for a specific Disaster.

III. GENERAL

A. Professional Qualifications:

1. FEMA's cultural resource staff, and any such State agency or consultant staff contracted by FEMA, will meet the Secretary of Interior's (Secretary's) *Professional Qualifications Standards (Qualifications)*, as determined by FEMA's Federal Preservation Officer (FPO) or designee, for their respective disciplines.
2. The signatories acknowledge that Native Hawaiian organizations possess special expertise in assessing the National Register eligibility of properties with religious and cultural significance to them.

B. Time designations: All time designations will be in calendar days. If any party does not comment on a proposed action within time frames stipulated in this Agreement, FEMA may assume that party's concurrence with FEMA's determination, and proceed in accordance with this Agreement.

C. FEMA responsibilities:

1. Will identify and evaluate historic properties. FEMA may request Federal, State agency, or applicant staff who meet the *Qualifications*, as determined by FEMA's FPO or designee, to identify and evaluate historic properties on behalf of FEMA, as described in 36 CFR § 800.4(b-c). FEMA will provide 100 percent funding for these delegated activities through standard procurement procedures (Form 40-1) under the Stafford Act.
2. Will review any National Register eligibility determinations resulting from these delegated activities.

3. Will provide the SHPO and ACHP with an annual report on this Agreement for the previous calendar year, on March 31st of each year that this Agreement is in effect. This report will summarize the actions taken to implement this Agreement, and recommend any actions or revisions to be considered during the next year. These parties will review this information to determine if amendments are necessary.

D. The SHPO, at its discretion, may:

1. Delegate any or all of its responsibilities under this Agreement to persons who are not currently members of the SHPO staff, but who may serve as SHPO representatives for decisions and actions required by this Agreement. The SHPO will consult with FEMA about the selection of any representatives, the scope of their responsibilities, and implementing procedures for their decisions and actions.
2. Prepare documentation about the effects of Undertakings on historic properties. The SHPO may delegate the responsibility for preparing documentation about effects of Undertakings on historic properties to a preservation consultant hired by an applicant, who meets the *Qualifications*. This will be a reimbursable expense for the applicant, subject to the cost-share provisions of the FEMA-State Agreement. The applicant will submit in writing the names and qualifications of potential consultants to the SHPO for approval. The SHPO will comment on the consultants submitted for consideration within 5 days of receipt of this information.
3. Request that FEMA convene a pre-disaster coordination conference/meeting with the SHPO, and annual review conferences/meetings as needed, to establish points of contact and protocols for implementation of this Agreement.

E. SCD responsibilities:

SCD will ensure that all applicants are fully informed about their responsibilities as stipulated in this Agreement. This includes providing applicants with guidance about in kind repairs, pursuant to the Secretary's *Standards for the Treatment of Historic Properties 1995 (Standards)*, and ensuring that applicants understand and acknowledge any additional stipulations placed on Undertakings as a result of Section 106 consultation or other terms of this Agreement. SCD will also ensure that all applicants understand that failure to comply with these terms will jeopardize Federal funding of an Undertaking.

F. ACHP responsibilities:

If the State of Hawaii Department of Land and Natural Resources is an applicant for FEMA assistance, or if FEMA determines that SHPO review of an Undertaking may appear to be a conflict of interest, ACHP will review the Undertaking in lieu of the SHPO.

IV. INITIAL COORDINATION FOLLOWING DECLARATION OF A DISASTER

- A. Upon declaration of a Disaster, FEMA will meet with the SHPO and SCD to establish points of contact and protocols for implementation of this Agreement. The SHPO may, and SCD will, attend a Disaster scoping meeting(s); and FEMA and SCD, as appropriate, will present information about the Section 106 review process to all applicants. For the declared Disaster area, the SHPO will provide or make available to the extent possible to FEMA, in writing, or in electronic form clearly accessible by FEMA:
 - 1. All information regarding properties in the State of Hawaii Inventory of Historic Properties (including the Hawaii Register of Historic Places).
 - 2. Any information that may identify areas with a high potential for archaeological resources. However, the SHPO may determine that it does not have such information, or that the information is not useful in identifying such areas.
 - 3. Any information that may identify areas where archaeological resources do not exist. However, the SHPO may determine that it does not have such information, or that the information is not useful in identifying such areas.
- B. FEMA may obtain information about Traditional Cultural Properties from Native Hawaiian organizations: these are properties with sacred, religious and cultural significance to Native Hawaiians. If FEMA requests, the SHPO: (1) may advise FEMA about consultation with Native Hawaiian individuals or organizations; (2) will advise FEMA about evaluating properties of traditional, religious and cultural significance to Native Hawaiians; and (3) will advise FEMA on how to avoid, minimize, or mitigate effects to such properties.
- C. Prior to implementation of the Programs, FEMA will, to the extent practicable:
 - 1. Develop with and provide to the SHPO a list of historic properties (standing structures) that have not retained integrity as a result of the Disaster. This Agreement will apply only to historic properties that retain integrity pursuant to 36 CFR Part 60. If FEMA and the SHPO do not agree on whether a property has retained integrity, through consultation not to exceed 14 days, FEMA may review any related Undertakings pursuant to Stipulations V. through VIII., or will proceed to Stipulation XI. C. through XI. I (Dispute Resolution).
 - 2. Consult with any other Federal agencies with jurisdiction for Undertakings, to ensure compliance with applicable historic laws and regulations, and to mutually determine the lead Federal agency for specific Undertakings.
- D. At the time of the Disaster scoping meeting(s), the SHPO:
 - 1. Will provide or make available to FEMA any information that the SHPO has about unevaluated properties that are not in the Hawaii Inventory of Historic Properties, but may be historic.

2. Will identify SHPO staff or consultants who may assist FEMA with its Section 106 responsibilities, and identify any specific activities that the SHPO may be able to perform at FEMA's request; and
3. If FEMA requests, may assist in identifying Native Hawaiian individuals or organizations with jurisdiction or a demonstrated interest in Undertakings, historic properties, or properties of religious and cultural significance in the Disaster area. FEMA will contact these interested parties to inform them of this Agreement and to request information on damaged historic properties.

V. EXPEDITED PROJECT REVIEW FOR EMERGENCIES

- A. Immediate rescue and salvage operations conducted to preserve life and property are exempt from the provisions of Section 106 [36 CFR § 800.12(d)].
- B. As a result of or in anticipation of a Disaster, FEMA may be requested to perform or fund emergency protective measures, in response to an immediate threat to human health and safety or improved property, that may adversely affect historic properties, or properties listed in the Hawaii Inventory of Historic Properties. For any Undertakings that the Federal Coordinating Officer (FCO) determines are of an emergency nature, FEMA may conduct an expedited review:
 1. The expedited review period will begin when FEMA determines that an emergency action is required, and will remain in effect until the review is complete, but for not more than 30 days.
 2. The FCO or designee will certify in writing to the FPO or designee a potential need for FEMA to conduct an expedited review for individual Undertakings. Should the FPO or designee concur, he/she will then certify this need in writing to the SHPO. Should FEMA find it necessary to extend the expedited review period beyond 30 days, FEMA will, in 30-day increments, request an extension from ACHP in writing. FEMA will immediately assume ACHP's concurrence unless notified otherwise.
- C. If the expedited review procedures apply, FEMA may fund an emergency action after completing the following review:
 1. FEMA will provide the SHPO with available information about the condition and historical status of the property, the proposed action, and prudent and feasible measures that would take the adverse effect into account, requesting the SHPO's comments. FEMA may provide this information in writing, or through telephone conversations, electronic media, or meetings, at its discretion. The SHPO may provide comments to FEMA within 3 days of receipt of the information, unless FEMA determines the nature of the emergency action warrants a shorter time period.
 2. Should the SHPO not comment within 3 days, FEMA may fund the action based on available information.

3. If FEMA objects to any SHPO comments, or if the SHPO objects to FEMA's proposal to conduct an expedited review, to the documentation provided, or to proposed treatment measures, FEMA will consult with the SHPO and attempt to resolve the dispute within 3 days of receipt of the objection. If the dispute is not resolved, FEMA will request ACHP's advice in accordance with 36 CFR § 800.2(b)(2). ACHP will advise FEMA within 3 days of receipt of the request, unless FEMA determines the nature of the emergency action warrants a shorter time period.

VI. PROGRAMMATIC ALLOWANCES

- A. FEMA will determine if the actions of an Undertaking conform to the Programmatic Allowances (Allowances) in Appendix A. If so, FEMA will document this determination in the project file and may fund the Undertaking.
- B. For all other activities, FEMA will conduct Section 106 review pursuant to Stipulation V. or VII.

VII. STANDARD PROJECT REVIEW

Except as described in Stipulation VI., FEMA will conduct the standard project review for all non-emergency Undertakings:

- A. Area of Potential Effects (APE): For standing structures, the APE will be the individual facility [as defined in 44 CFR § 206.201(c)] when a proposed Undertaking is limited to the repair or rehabilitation of the facility's interior and/or exterior. FEMA will determine the APE, and may consult with the SHPO, for all other Undertakings, including APEs for ground disturbing activities.
- B. If FEMA determines that there is a reasonable potential for archeological properties to be within the APE, FEMA will also determine the level of effort necessary to identify and define the limits of these properties.
- C. FEMA will identify and evaluate properties to determine if they are listed in or eligible for the National Register. If FEMA does not identify any historic properties, or determines that an Undertaking avoids archeological historic properties (both directly and indirectly) or character-defining features of historic standing structures, FEMA will make a documented determination of "no historic properties affected" as described in 36 CFR § 800.4(d)(1). Unless the SHPO or any other consulting party objects within 21 days of receipt of this documented determination, FEMA will complete the review and may fund the Undertaking. If the SHPO or any other consulting party objects to the determination, FEMA may request ACHP review, as described in 36 CFR § 800.4(d)(1)(ii), or will proceed as follows:
- D. If FEMA determines that an Undertaking may affect historic properties, FEMA will apply the criteria of adverse effect, described in 36 CFR § 800.5(a)(1), or determine whether the Undertaking meets the *Standards*, or any other applicable Secretary standards or guidelines.

1. FOR STANDING STRUCTURES:

- a. If FEMA, in consultation with the SHPO, determines that the Undertaking does not meet the adverse effect criteria, or that it meets the applicable *Standards*, FEMA will make a determination of “no adverse effect,” as described in 36 CFR § 800.5(b), notify the SHPO and any other consulting party, and provide project documentation described in 36 CFR § 800.11(e). Unless the SHPO or any other consulting party objects within 21 days of receipt of this documented determination, FEMA will complete the review and may fund the Undertaking.
- b. If the SHPO or any other consulting party objects to the “no adverse effect” determination, FEMA will require the applicant to revise the scope of work, in consultation with the objecting party, to clearly conform to the applicable *Standards*. FEMA will also review the revised scope of work for funding eligibility. If the applicant revises the scope of work accordingly, FEMA will notify the SHPO and any other consulting party, complete the review, affirm its original determination, and may fund the Undertaking.
- c. If the objection is not resolved through revision of the Undertaking as described above, FEMA may proceed in accordance with 36 CFR § 800.5(c)(2-3), or will initiate adverse effect consultation pursuant to Stipulation VIII.

2. FOR ARCHEOLOGICAL PROPERTIES:

If the SHPO or any other consulting party objects to FEMA’s “no adverse effect” determination, or to its determination that identified historic properties will be avoided (both directly and indirectly) through project redesign, procedures, or requirements agreed to among all consulting parties, FEMA may request ACHP review under 36 CFR §§ 800.4(d)(1) or 800.5(c)(3), or will initiate adverse effect consultation pursuant to Stipulation VIII.

VIII. RESOLUTION OF ADVERSE EFFECTS ON HISTORIC PROPERTIES

- A. If FEMA determines that an Undertaking will adversely affect a historic property, it will also determine whether the effects of the Undertaking will be resolved with a Memorandum of Agreement (MOA), in accordance with 36 CFR § 800.6(b), or with a Secondary Programmatic Agreement (Secondary Agreement). FEMA will notify the SHPO, ACHP, and any other consulting party of these determinations and provide documentation described in 36 CFR § 800.11(e).
 1. Memorandum of Agreement: FEMA may develop an MOA in accordance with 36 CFR § 800.6(c) to stipulate measures to minimize or mitigate adverse effects on historic properties. The MOA may include feasible measures that may serve an equal or greater public benefit than recordation or archeological data recovery, while promoting the preservation of historic properties. FEMA may develop a list of such measures in consultation with any consulting parties. These measures may include, but are not limited to: preservation planning, interpretive programs, mitigation banking, technical preservation

studies and experiments, or development of a historic properties database using Geographic Information Systems.

2. Secondary Programmatic Agreement: FEMA, the SHPO, SCD, ACHP if participating, and any other consulting party may develop a Secondary Agreement to identify programmatic conditions or treatment measures for multiple similar Undertakings by an applicant.
 3. Should FEMA and the SHPO agree that an Undertaking may adversely affect a historic property, but the Undertaking substantially complies with the applicable *Standards*, these parties may also agree that conditions or measures are not necessary, and that an MOA or Secondary Agreement will not be developed. FEMA will confirm this agreement in writing with the SHPO and any other consulting party. Unless any of these parties objects within 21 days of receipt, FEMA will complete the review and may fund the Undertaking. Should FEMA and the SHPO not agree as described above, FEMA will proceed in accordance with Subsection 1. or 2. of this Stipulation, rather than with Stipulation XI.
- B. FEMA will involve the public in the resolution of adverse effects in accordance with 36 CFR § 800.6(a)(4).
- C. Should FEMA determine that an Undertaking may adversely affect a National Historic Landmark (NHL), it will notify the Secretary (through the NHL Program Manager at the National Park Service Pacific Great Basin Support Office in Oakland, California) and invite the Secretary to participate in consultation. When ACHP participates in consultation related to an NHL, it will report the results to the Under Secretary of the Emergency Preparedness and Response Directorate, Department of Homeland Security, and the Secretary.

IX. CHANGES TO AN APPROVED SCOPE OF WORK

SCD will notify FEMA as soon as practicable of any proposed change to the approved scope of work for an Undertaking involving a historic property. FEMA may authorize the applicant to proceed with the change if it meets an Allowance, or if, for a standing structure, FEMA and the SHPO agree that the change conforms to the *Standards*. If FEMA and the SHPO determine that the change cannot be modified to conform to the *Standards*, FEMA will initiate adverse effect consultation pursuant to Stipulation VIII.

X. UNEXPECTED DISCOVERIES

- A. SCD will notify FEMA as soon as practicable if it appears that an Undertaking will affect a previously unidentified property that may be historic, or affect a known historic property in an unanticipated manner. SCD will require the applicant to stop construction activities in the vicinity of the discovery, and take all reasonable measures to avoid or minimize harm to the property until FEMA concludes consultation with the SHPO. In the case of human remains, SCD will also require the applicant to immediately notify the local law enforcement office and the county coroner/medical examiner. Pursuant to the Hawaii Historic Preservation Program, if the coroner/medical examiner determines that the human remains are or may be of Native Hawaiian origin, the discovery will be treated in accordance with the Hawaii Revised Statutes § 6E, as amended.

- B. FEMA will consult with the SHPO as soon as practicable to develop actions to take into account the effects of the Undertaking. FEMA will notify the SHPO of any time constraints, and these parties will mutually agree upon time frames for this consultation. SCD and the applicant may also participate in this consultation. FEMA will then provide the SHPO with written recommendations that take into account the effects of the Undertaking. If the SHPO does not object to FEMA's recommendations within an agreed upon time frame, FEMA will require the applicant to modify the scope of work accordingly.

XI. DISPUTE RESOLUTION

- A. Should the SHPO, SCD, ACHP, or any other consulting party (including consulting parties participating in the review of specific Undertakings subject to this Agreement) object in writing within time frames established by this Agreement to any plans, specifications, determinations, or other actions subject to review pursuant to this Agreement, FEMA will consult with that party for not more than 21 days to resolve the objection. Should FEMA object in writing within established time frames, FEMA will consult with these other parties, as appropriate, for not more than 21 days to resolve the objection.
- B. If the objection is resolved within 21 days, FEMA may proceed with the disputed action in accordance with the resolution.
- C. If FEMA determines within 21 days that the objection cannot be resolved, FEMA will forward to ACHP all documentation relevant to the objection, including FEMA's proposed resolution. Within 30 days of receipt, ACHP will:
 - 1. Concur in FEMA's proposed resolution, whereupon FEMA will respond to the objection accordingly; or
 - 2. Provide FEMA with recommendations, which FEMA will take into account in reaching a final decision regarding the objection; or
 - 3. Notify FEMA that the objection will be referred for comment in accordance with 36 CFR § 800.7(a)(4), and proceed to do so. FEMA will take the resulting comment into account in accordance with 36 CFR § 800.7(c)(4).
- D. Should ACHP not respond within 30 days, FEMA may assume ACHP's concurrence in FEMA's proposed resolution.
- E. FEMA will take into account any ACHP recommendations or comments, and any comments from the other signatories or consulting parties, in reaching a final decision regarding the objection. The signatories will continue to implement all other terms of this Agreement that are not subject to objection.
- F. FEMA will provide the signatories with its final written decision regarding any objection resolved pursuant to this Stipulation.

- G. FEMA may authorize any disputed action to proceed, after resolving the related objection pursuant to this Stipulation.
- H. At any time while this Agreement is in effect, should a member of the public object in writing to implementation of its terms, FEMA will notify the other signatories in writing and take the objection into consideration. FEMA will consult with the objecting party and, if that party so requests, the other signatories, for not more than 21 days. In reaching its decision regarding the objection, FEMA will take into consideration all comments from these parties. Within 14 days after closure of this consultation period, FEMA will provide the other parties with its written decision. FEMA's decision will be final.
- I. Any dispute regarding National Register eligibility that is not resolved pursuant to this Stipulation will be resolved in accordance with 36CFR § 800.4(c)(2).

XII. ANTICIPATORY ACTIONS

- A. FEMA will not grant assistance to an applicant who, with intent to avoid the requirements of this Agreement or Section 106 of the NHPA, has significantly adversely affected a historic property to which the assistance would relate, or having legal power to prevent it, allowed such significant adverse effect to occur. After consultation with ACHP, FEMA may determine that circumstances justify granting such assistance despite an adverse effect created or permitted by the applicant, and will complete consultation for the Undertaking pursuant to Stipulation VIII.
- B. SCD will routinely advise its applicants in writing that they may not initiate construction on projects for which they are requesting Federal funds prior to compliance with this Agreement. SCD will also routinely advise its applicants that they will jeopardize Federal funding if such construction is initiated.

XIII. DURATION, AMENDMENTS, AND TERMINATION

- A. Duration: Unless terminated pursuant to Stipulation XIII.C., this Agreement will remain in effect for a specific Disaster until FEMA, in consultation with all other signatories, determines that this Agreement has been fulfilled in a satisfactory manner. Upon such determination, unless amended otherwise, this Agreement will terminate for that Disaster, but will continue for previous or future Disasters. FEMA will provide all other signatories with written notice of its determination and of such termination. Unless amended otherwise, this Agreement will expire on December 31, 2015.
- B. Amendments: Any signatory may propose that this Agreement be amended, whereupon the signatories will consult for not more than 60 days to consider the amendment. The amendment process will comply with 36 CFR §§ 800.6(c)(1) and (7). This Agreement may be amended only upon the written agreement of the signatories. If not amended, this Agreement may be terminated in accordance with Stipulation XIII. C. below. Appendix A, Section B, may be amended in writing by FEMA and the SHPO without amending the Agreement proper.

- C. Termination: Any signatory except SCD may terminate this Agreement by providing a 30-day written notice to the other signatories, provided they consult during this period to seek amendments or other actions that would prevent termination. Should the signatories agree on an alternative to termination, they will proceed in accordance with that agreement. Should consultation fail, the signatory will promptly notify the other signatories in writing of termination. Termination of this Agreement will require compliance with 36 CFR Part 800. This Agreement may be terminated without further consultation by the execution of a subsequent Agreement that explicitly terminates or supersedes it, or by implementation of Program Alternatives, pursuant to 36 CFR § 800.14.

XIV. EXECUTION OF THIS PROGRAMMATIC AGREEMENT

- A. This Agreement takes effect on the date of signature by ACHP.
- B. Any FEMA Programs authorized by the United States Congress in the future may be included in this Agreement without its amendment. At FEMA's discretion, any change in the FEMA name, Programs, or organizational structure will not affect this Agreement.

EXECUTION AND IMPLEMENTATION of this Programmatic Agreement evidences that FEMA has afforded ACHP a reasonable opportunity to comment on FEMA's administration of all referenced Programs pursuant to the Stafford Act and the National Flood Insurance Act, and that FEMA has satisfied its Section 106 responsibilities for all individual Undertakings of the Programs.

DEPARTMENT OF HOMELAND SECURITY

FEDERAL EMERGENCY MANAGEMENT AGENCY

By: Karen E. Armes
Karen E. Armes, Acting Regional Director, Region IX

Date: 11/30/05

By: Alessandro Amaglio
Alessandro Amaglio, Environmental Officer, Region IX

Date: Nov. 29, 2005

HAWAII STATE HISTORIC PRESERVATION OFFICER

By: Peter T. Young
Peter T. Young, State Historic Preservation Officer

Date: SEP 15 2005

HAWAII STATE CIVIL DEFENSE

By: Edward T. Teixeira
Edward T. Teixeira, Governor's Authorized Representative

Date: Sep. 30, 2005

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler
John M. Fowler, Executive Director

Date: 12/21/05

APPENDIX A: PROGRAMMATIC ALLOWANCES

A. The following Programs and activities will not require review by the SHPO or ACHP pursuant to Stipulation V. or VII.:

- I. Providing Federal assistance to individuals and households pursuant to Section 411 of the Stafford Act, Individual and Family Grant Programs, except for ground disturbing and construction activities related to temporary housing;
- II. Providing Federal assistance pursuant to Section 422 of the Stafford Act, Simplified Procedures, by restoring a facility to its pre-disaster condition, using in kind materials; and
- III. Providing Federal funds for acquiring properties in buyout projects. SCD will ensure that each applicant agrees to secure its property from physical alteration, illegal entry, and damage until any applicable requirements of this Agreement are fulfilled. The applicant community will agree to these terms as a condition of its acquisition grant before FEMA will release any related funding.

B. The following activities will not require review by the SHPO or ACHP pursuant to Stipulation V. or VII. This list may be revised without amending this Agreement, with a letter concurred by FEMA and the SHPO.

I. GROUND DISTURBING ACTIVITIES AND SITE WORK, limited to previously-disturbed soil, both horizontally and vertically

A. Ground disturbing activities related to the repair, in-place replacement, or hardening of:

- 1. footings, foundations, retaining walls, other earth retaining or slope stabilization systems (such as gabion baskets), and utilities (such as sewer, water, storm drain, electrical, gas, communication, and leach lines, and septic tanks), and
- 2. culvert systems within rivers, streams, or drainage ways, when the work is performed substantially to pre-disaster conditions, or with a modest increase in size or capacity.

If the repaired or replaced items are at least 50 years of age, this Allowance applies only when the work is performed in kind to exactly match existing materials and form.

- B. Installation of utilities within existing rights-of-way, but not under improved roads or roadways, provided the affected portion of the right-of-way was previously surveyed for cultural resources and does not contain historic properties.
- C. Repair or replacement of driveways, parking lots, and walkways.
- D. Repair or replacement of fencing and freestanding exterior walls, when performed in kind to exactly match existing materials and form.

- E. Repair or replacement of metal utilitarian structures, including exposed major pipelines and pump houses, when performed in kind, or to match the pre-disaster size and configuration with (superior functioning) modern materials. Any finish on modern materials must be compatible with the site and context. Bridges, water towers, and antenna towers are not considered metal utilitarian structures for the purposes of this Allowance.
- F. Installation of temporary structures for uses such as classrooms or offices. This Allowance does not apply to ground disturbing activities, or structures installed in historic districts.
- G. Installation of scaffolding or temporary barriers such as chain link fences, polyethylene sheeting, or tarps.
- H. Repair or replacement of hardscaping and related utilities, including paving, planters, trellises, irrigation, and lighting, when performed in kind to match existing materials and form.
- I. Repair or replacement, and upgrades to applicable codes and standards, of piers, docks, boardwalks, boat ramps, and dune crossovers, within existing footprints. This Allowance applies to properties that are at least 50 years of age only when the work is performed in kind to exactly match existing materials and form.
- J. Debris collection from public rights-of-way, transportation, and disposal in existing licensed solid waste facilities. Wood chipping on paved ground, transportation, and legal disposal. This Allowance does not include establishment or expansion of debris staging or disposal areas.
- K. Sediment removal from man-made drainage facilities, including retention/detention basins, ponds, ditches, and canals, when the facility is restored to its pre-disaster condition, and the sediment is used to repair eroded banks, or disposed of at an existing licensed or permitted spoil site.
- L. Dewatering flooded developed areas.

II. BUILDINGS

A. Interior Floors, Walls, Ceilings and Stairs

- 1. Interior rehabilitation projects limited to repairing, replacing, retaining, preserving, protecting, and maintaining in kind materials and features, consistent with the Secretary's *Standards*.
- 2. Repair of interior floors, walls, and ceilings to exactly match existing surfaces, including plaster, drywall, and cracks up to one inch wide. Any repair materials will match the color and workmanship of the existing materials. The repairs must be restricted to the damaged area, and care must be taken to avoid adjacent areas. This Allowance does not apply to decorative plaster trim or other finishes that contribute to the architectural significance of the property.

3. Repair or replacement of suspended or glued ceiling tiles.
4. Installation of grab bars, and other minor interior modifications for handicapped accessibility.
5. Non-destructive, concealed, or concealable testing for hazardous materials (lead paint, asbestos, etc.), or for assessment of hidden damages.

B. Utility and Mechanical Systems

1. Minor electrical and plumbing work within buildings, limited to repairing, upgrading, elevation, or in kind replacement, except that fixtures at least 50 years of age will be repaired when possible.
2. Repair, replacement, upgrade, or installation of fire detection and suppression, security alarm, and HVAC systems, provided they do not affect the exterior of a building or require installation of new duct work or surface mounted wiring throughout the interior. Fixtures at least 50 years of age will be repaired when possible.

C. Windows and Doors

1. Repair or replacement of damaged or deteriorated windows and doors, when performed in kind to exactly match existing materials and form.
2. Replacement of window panes in kind or with clear double or triple glazing, provided the work does not alter the existing window materials and form. This Allowance does not apply to archaic or decorative glass. Glazing at least 50 years of age may be treated with clear window films only.
3. Door and window hardware that is at least 50 years of age will be repaired when possible.

D. Exterior Walls, Cornices, Porches and Foundations

1. Repainting of surfaces, provided that destructive preparation treatments, including but not limited to, water blasting, sandblasting, and chemical cleaning, are not used.
2. Repair or partial replacement of exterior siding, cornices, porches, balustrades, stairs, or trim when performed in kind to exactly match existing materials and form.
3. Repair or replacement of signs or awnings to closely match existing materials and form.
4. Temporary bracing or shoring for stabilization.
5. Anchoring of masonry walls to floor systems, provided the anchors are embedded and concealed from exterior view, such as in the Hilti systems.

- a. Repair or reconstruction of parapets and chimneys to exactly match all existing materials and visual features. Bracing and reinforcing of fireplaces and chimneys, provided the bracing and reinforcing are either concealed from exterior view or removable in the future.
- b. Stabilization of foundations and the addition of foundation bolts, provided that visible masonry foundation mortars match the color, strength, and joint tooling of any foundation mortars that are at least 50 years of age.

E. Roofing

Repair, replacement, or strengthening of roofing, gutters, and downspouts, when performed in kind to exactly match existing materials and form. However, cement asbestos shingles may be replaced with asphalt shingles, and untreated wood shingles may be replaced with fire resistant wood shingles.

F. Weatherproofing and Insulation

- 1. Caulking and weather-stripping with compatibly colored materials.
- 2. Replacement or installation of insulation with an adequate vapor retarder, provided that decorative interior plaster, woodwork, or exterior siding is not altered. This Allowance does not apply to exterior insulation finishing systems (EIFS), urea formaldehyde foam insulation, or any other thermal insulation with water in its chemical composition, when installed within wall cavities or other spaces that are not vented.

G. Seismic Upgrades

Installation of the following seismic upgrades, provided they are not visible on the exterior or within character defining interiors at least 50 years of age: cross bracing on pier and post foundations; metal fasteners; collar ties; gussets; tie downs; strapping and anchoring of mechanical, electrical, and plumbing equipment; anchoring of furniture; plywood diaphragms beneath first floor joists, above top floor ceiling rafters, and on roofs; and automatic gas shut off valves.

III. ROADS AND ROADWAYS

- A. Repair of a road to pre-disaster geometric design standards and conditions, with in kind materials, number and width of lanes, shoulders, medians, curvatures, grades, clearances, and side slopes.
- B. Repair of road composition with in kind surface materials to maintain pre-disaster size, traffic capacity, and load classification of motor vehicles, such as reshaping and compacting roadbed soil, or repairing asphaltic or Portland cement concrete pavement. This Allowance does not apply to brick or stone paving, or to re-grading of native materials to reconstruct the roadbed.
- C. Repair of traffic control devices such as signs, signals, delineators, pavement markings, and ramp and traffic surveillance systems.

- D. Repair of road lighting with in kind systems.
- E. Repair of other road appurtenances in kind, such as curbs, berms, and sidewalks, except for brick sidewalks.
- F. Repair of roadway safety elements in kind, such as barriers, guardrails, and impact-attenuation devices.

APPENDIX F

ICRMP DISTRIBUTION LIST

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ICRMP Update Review Distribution List	
HIARNG Offices	
Facilities Management Office (FMO)	LTC Stubbart – Inter Office Mail
Operations (G3)	COL Logan – Inter Office Mail
Public Affairs Office (PAO)	LTC Anthony – Inter Office Mail
Chief of Staff	COL Spray – Inter Office Mail
HIARNG Commander	BG Oliveria – Inter Office Mail
The Adjutant General (TAG)	BG Logan – Inter Office Mail
HIENG – State Engineering Office	LTC Mitsuyoshi – Inter Office Mail
State Agencies / City & County of Honolulu Offices	
State Historic Preservation Division/ Island Burial Councils (Part of SHPD)	Mr. Alan Dower State Historic Preservation Officer Dept. of Land and Natural Resources Kakuhihewa Bldg. 601 Kamokila Blvd. Suite 555 Kapolei, HI 96707
Office of Hawaiian Affairs	Dr. Kamanaʻopono M. Crabbe Ph.D Ka Pouhana, Chief Executive Officer 560 N. Nimitz Hwy., #200 Honolulu HI 96817
Department of Hawaiian Homelands	Jobie Masagatani PO Box 1879 Honolulu HI 96805
DLNR – State Parks Division	Department of Land and Natural Resources Division of State Parks PO Box 621 Honolulu HI 96809
UH Hilo – College of Ag, Forestry & NR Mgmt	Dr. Bruce W. Mathews UH Hilo (CAFNRM) 200 W. Kawili St. Hilo, HI 96720
Neighborhood Commissions Office	Neighborhood Commissions Office 530 South King Street, Rm 406 Honolulu HI 96813
Diamond Head Neighborhood Board	George West 3207 Catherine St. Honolulu HI 96815
Waimānalo Neighborhood Board	Wilson Kekoa 41-696 Kalanianaʻole Hwy. Waimānalo, HI 96795
East Hawaiʻi Planning Department	Aupuni Center 101 Pauahi St. Suite 3 Hilo, HI 96720

West Hawai'i Planning Department	74-5044 Ane Keohokalole Hwy. Bldg E Kailua-Kona, 96740
Honolulu County Planning Department	C&C of Honolulu Dept. of Planning and Permitting 650 South King St. Honolulu HI 96813
Kaua'i County Planning Department	Michael A. Dahilig 4444 Rice Street, Suite A473 Līhu'e, HI 96766
Maui County Planning Department	William Spence 2200 Main St. Suite 315 Wailuku HI 96793
Federal Agencies	
National Guard Bureau (NGB) -ILE	Rebecca Klein CRM AMRDEC Safe Website
Advisory Council on Historic Preservation (ACHP)	Kate Kurr 401 F Street NW, Suite 308 Washington DC 20001-2637
National Park Service (NPS)	National Park Service 1849 C Street NW Washington, DC 20240
Department of the Interior (DOI)	Department of the Interior 1849 C Street, N.W. Washington DC 20240
U.S. Fish and Wildlife Service (USFWS)	USFWS – Pacific Region 911 NE 11 th Ave. Portland, OR 97232
U.S. Geological Survey (USGS)	U.S. Geological Survey 677 Ala Moana Blvd. Honolulu HI 96813
Department of the Navy – Environmental	Department of the Navy Pacific Division Naval facilities Engineering Command 258 Makalapa Dr. Suite 100 Pearl Harbor, HI 96860
Marine Corps Base Hawai'i – Environmental	Commanding Officer Attn: LE Box 63062 Environmental Kāne'ohe Bay HI 96863-3062
Department of the Army – Environmental	Department of the Army USAG-HI, Directorate of Public Works Environmental Division (IMHW-PWE) Attn: Richard Davis 947 Wright Ave, Wheeler Army Airfield Schofield Barracks, HI 96857-5013

Department of the Air Force	Department of the Air Force – Pacific Region 15 CES/CEV 75 H Street Hickam AFB HI 96853
Native Hawaiian Organizations / Non-Profits	
Ahahui Siwila Hawai'i O Kapolei	Lance Holden PO Box 700007 Kapolei HI 96709
Association of Hawaiian Civic Clubs	Soulee LKO Stroud PO Box 1135 Honolulu HI 96807
Friends of Mokuula Inc.	Blossom Feiteira 505 Front St. Suite 221 Lahaina, HI 96761
Hawaiian Civic Club of Hilo	Antoinette K. Mallow PO Box 592 Hilo, HI 96721
Historic Hawai'i Foundation	Kiersten Faulkner Historic Hawai'i Foundation The Dole Cannery 680 Iwilei Rd Dole Office Bldg Tower, Suite 690 Honolulu HI 96817
Hui Mālama I Na Kupuna O Hawai'i Nei	Edward Halealoha Ayau 622 Wainaku Ave. Hilo, HI 96720
Kawaihapai 'Ohana	Thomas T. Shirai Jr. Po Box 601 Waialua, HI 96791
Maluohai Residents Association	Homelani Schaedel PO Box 700911 Kapolei HI 96709
Moku O Kaupo	Jade Alohalani Smith PO Box 1269 Kula, HI 96790
'Ohana Keaweamahi	Paulette Kaleikini 89-107 Nanaikala St. Waianae HI 96792
Piihonua Hawaiian Homestead Community Association	Kaleo Aki 37 Waiea Place Hilo, HI 96720
Waimānalo Hawaiian Homes Association	Paul Richards PO Box 353 Waimānalo HI 96795

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APPENDIX G

**ICRMP ANNUAL UPDATES &
AEDB-EQ CULTURAL DATA CALLS**

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Annual ICRMP Updates:

NGB no longer requires states to submit an annual report. The CRM is still required to complete an annual update of the ICRMP but it is for internal review and implementation only. The ICRMP implementation will be evaluated every 3 years by an External EPAS inspection.

Army Environmental Database – Environmental Quality:

Data calls are sent out from NGB on a quarterly basis to state ARNG Environmental offices. The data call requires the CRM to enter Cultural data information for NGB records. The following spreadsheet is a tool for the CRM to assist in recordkeeping of cultural data submitted to NGB in the 3rd quarter of the year.

AEDB-EQ Cultural Resources Data Call Responses FY14

National Guard Bureau AEDB-EQ Cultural Data Call					
HAWAII ARMY NATIONAL GUARD	FY 14	FY 15	HAWAII ARMY NATIONAL GUARD	FY 14	FY 15
1. Are there any recorded archeological sites on your installation?	Yes		4. How many recorded archeological sites were removed from the inventory in the current FY? Please identify (if any) the number of recorded archeological sites that may have been removed from your inventory count. They may have been removed because they were destroyed, mitigated or for other reasons, such as data correction or removal of duplicates. If sites were mitigated but still remain in your inventory as they continue to be managed under NHPA and ARPA, then include those sites in your response	0	

National Guard Bureau AEDB-EQ Cultural Data Call					
HAWAII ARMY NATIONAL GUARD	FY 14	FY 15	HAWAII ARMY NATIONAL GUARD	FY 14	FY 15
2. How many recorded archeological sites (total for all reporting years including current FY) are on your installation? For the purposes of this survey, recorded archeological sites are those sites which have been officially identified and given identification numbers (trinomials or other SHPO unique site designations) and which currently still exist (i.e. are not destroyed). Do not include isolated finds in your count of archaeological sites even if you have received a site number for such a find.	1		5. How many archeological sites have been determined eligible for listing or are listed on the National Register of Historic Places? Eligibility determinations are made in conjunction with and require concurrence from the State Historic Preservation Officer, or through an official Determination of Eligibility from the Keeper of the National Register, against the eligibility criteria in NHPA. DO NOT INCLUDE 'potentially eligible' sites. This number cannot be larger than the number of recorded sites.	1	
3. How many of the recorded archeological sites were added to the inventory in the current FY?	0		6. How many sites were evaluated and determined eligible for listed in the NR? Sites which may or may not have been previously recorded sites but have been newly determined eligible or listed in the current FY and for which a determination of eligibility, with SHPO concurrence, has been made.	0	
7. How many archeological sites if any that were previously determined eligible or listed on the NR were determined ineligible with SHPO concurrence or were delisted from the NR in the current FY? Sites may have been re-evaluated and determined ineligible or delisted because they were destroyed, mitigated, or their integrity was compromised for other reasons.	0		10. Is there a Federal Archeological Collection associated with the installation? For all questions in this section - Installations are responsible for collections and records from Federal Army installations and from certain lands leased or withdrawn from other entities as stipulated in the lease or withdrawal agreement. An archeological collection (per 36 CFR 79) for the purposes of this survey is defined as material remains that are excavated or removed during a survey, excavation or other study.	Yes	

National Guard Bureau AEDB-EQ Cultural Data Call					
HAWAII ARMY NATIONAL GUARD	FY 14	FY 15	HAWAII ARMY NATIONAL GUARD	FY 14	FY 15
8. Please identify the number of sacred sites that have been recorded on your installation. As defined by EO 13007, a sacred site is a specific delineated location on Federal land that is identified by a Federally-recognized Indian tribe or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion, and that has been identified by the tribe or individual.	0		11. For all years including the reporting year, how many cubic feet of archeological collections does the installation own? Any archeological items recovered during archeological projects on your installation are owned by the installation regardless of who has possession. This excludes items repatriated under NAGPRA.	47	
9. Please identify the number of sites of traditional religious and cultural importance to Native Americans or Native Hawaiians (as defined by NHPA and determined eligible in consultation with the SHPO, tribal government, or NHO) that have been recorded on your installation. If such sites have been tentatively identified but have not been assessed for eligibility, they should not be included in this response.	0		12. How many cubic feet of collections are curated to 36 CFR 79 standards?	0	
13. How many cubic feet of collections were acquired during the current reporting year?	2		19. For all years including the reporting year, how many megabytes (MB) of digital files associated with stored archeological materials does the installation own?	140	
14. If you had a reduction in volume to any of your archaeological collections in the reporting year, by how many cubic feet was your archaeological collection reduced? Reasons for such a reduction might include parts of collections destroyed for	0		20. For all years including the reporting year, how many megabytes (MB) of digital files associated with stored archeological materials are digitally curated per 36 CFR 79 standards?	140	

National Guard Bureau AEDB-EQ Cultural Data Call					
HAWAII ARMY NATIONAL GUARD	FY 14	FY 15	HAWAII ARMY NATIONAL GUARD	FY 14	FY 15
health and safety reasons or consumptive analysis, repatriation under NAGPRA, or transfer to another federal agency.					
15. For all years including the reporting year, how many linear feet of records associated with stored archeological materials does the installation own? Any records associated with archeological surveys, excavations, or studies conducted with Federal funds are owned by the installation, regardless of whether the surveys, etc., were conducted on Federal land. Such records may include field notes, survey documentation, maps, photographs, reports, and electronic data such as survey area and site coordinates.	5		21. How many megabytes (MB) were acquired in the reporting year?	40	
16. How many linear feet of records associated with stored archeological collections are curated to 36 CFR 79 standards?	0		22. Are there any recorded archeological sites on your installation? Enter the same answer provide in question #1 of this survey:	Yes	
17. How many linear feet of associated records were acquired in the reporting FY (for this question answer is in decimal format - include at least one number to the right of the decimal point)?	0.5		23. How many permit applications under ARPA were received during this FY?	0	
18. Were some portion of archeological collections inspected during the reporting year to assess compliance with 36 CFR 79 curation standards?	No		24. How many permits were issued or were in effect during this FY?	0	

National Guard Bureau AEDB-EQ Cultural Data Call					
HAWAII ARMY NATIONAL GUARD	FY 14	FY 15	HAWAII ARMY NATIONAL GUARD	FY 14	FY 15
25. How many notifications were sent to Indian tribes of proposed work under ARPA permits that might harm or destroy archeological sites having religious or cultural importance to the tribes?	0		31. Are known archeological sites present on your Federally-owned or managed lands? Owned and managed lands refer to those lands encompassing all Army operations, activities, real property, and property interests owned, leased, permitted, or controlled, in the United States, including public lands withdrawn from all forms of appropriation pursuant to public land laws and reserved for military use, as well as State lands used for military training and testing.	Yes	
26. What is the total number of documented violations of ARPA this FY? Installation law enforcement officials must have formally recorded these violations.	0		32. For all years, including the reporting year, what is the cumulative total of archaeological sites on lands that you own or manage? (Count only the number of individual sites and do not include sites that are contributing elements in a district. The number of sites reported for this question should equal the cumulative total of sites reported in questions 40-43)	12	
27. What is the number of documented violations in which individuals were arrested?	0		33. How many archeological sites were assessed for condition in the current FY?	11	
28. How many individuals were convicted of a misdemeanor under ARPA?	0		34. How many archeological sites were stabilized, rehabilitated, monitored, or protected (e.g., signs, fences or road closures) in the reporting year?	1	
29. How many individuals were convicted of a felony under ARPA?	0		35. How many archeological sites require protective measures? Sites might require protection from erosion, looting, or mission impacts among other reasons.	1	

National Guard Bureau AEDB-EQ Cultural Data Call					
HAWAII ARMY NATIONAL GUARD	FY 14	FY 15	HAWAII ARMY NATIONAL GUARD	FY 14	FY 15
30. Does your installation have protective signage (ARPA signage) for archaeological sites that require protective measures on your installation?	No		36. How many archeological sites listed in question #35 have protective measures in-place? Protective measures may include seibert stakes, fencing, signage, site hardening, and GIS mapping to indicate land use constraints.	1	
37. How many known archeological sites were evaluated for the NRHP this year?	11		41. For all years including the reporting year, how many archaeological sites on your installation have not been evaluated for National Register eligibility?	0	
38. How many archeological sites listed in question #37 were located on training ranges and prioritized in consultation with the training community prior to conducting eligibility determinations?	0		42. For all years including the reporting year, how many archaeological sites on the installation have been assessed for National Register eligibility and were determined ineligible through consultation and concurrence with the SHPO or the Keeper? Please only count sites for which you have written documentation of concurrence on ineligible status.	1	
39. How many archeological sites were subjected to data recovery during the FY? Include projects related to NHPA and/or ARPA. Data recovery is a common mitigation measure that, through implementation of a treatment plan, retrieves the important information present within an archaeological site that makes it eligible before the site's integrity is compromised or destroyed. For purposes of this data call, do not include site testing to determine specific site attributes such as boundaries or eligibil	0		43. For all years including the reporting year, how many archaeological sites on the installation have been assessed for National Register eligibility and were determined eligible through consultation and concurrence with the SHPO or the Keeper? Please only count sites for which you have written documentation of concurrence on eligibility status.	11	

National Guard Bureau AEDB-EQ Cultural Data Call					
HAWAII ARMY NATIONAL GUARD	FY 14	FY 15	HAWAII ARMY NATIONAL GUARD	FY 14	FY 15
40. How many archeological sites are listed on the National Register as individual sites? Count only those sites that are individually listed on the National Register including those sites that are NHL, but do not include sites that are contributing elements in a district.	0		44. How many partnership agreements does your installation have for its archeological program? Partnerships can include cooperative, cost-share, interagency or research agreements; contracts are not included.	0	
45. What is the estimated total dollar value of contributions provided by partners (e.g., money, services, volunteers working directly for partners)?	0		50. How many acres on your installation have been surveyed for archaeological resources in the reporting year? Do not include acreage that was surveyed more than one time.	0	
46. How many volunteer hours were contributed directly to your installation for the benefit of archeological activities?	0		51. Total acreage surveyed in the reporting year which were programmed and prioritized in consultation with the training community? This should be equal to or less than the acreage reported in question #50.	0	
47. Were specific goals for archaeological surveys included in the ICRMP and programmed in your budget?	Yes		52. For all years including the reporting year, how much acreage within the installation's training areas that are available for survey have been surveyed? This should be equal to or less than the acreage reported in question #49. Lands available for survey are the total acreage of the installation's training areas, minus surface danger zones, acreage underwater, or other inaccessible areas.	871	
48. How many acres on your installation are accessible for archeological survey? Lands accessible for survey are the total acreage of the installation (or state or RRC, as applicable), minus surface danger zones, acreage underwater, or other inaccessible	1259		53. For how many of those acres surveyed for archeological resources (as reported in question 49) is the survey information available in GIS (enter number of acres, not a percentage)?	656	

National Guard Bureau AEDB-EQ Cultural Data Call					
HAWAII ARMY NATIONAL GUARD	FY 14	FY 15	HAWAII ARMY NATIONAL GUARD	FY 14	FY 15
areas.					
49. For all years including the reporting year, how many acres on your installation have been surveyed for archeological resources? The response provided here cannot exceed the number of acres accessible for survey that was reported in question 48 and should not include acreage that was resurveyed.	871		54. For how many of the archeological sites on the installation (as reported in question 32), is the location available in GIS (enter number of sites, not a percentage)? This includes GIS layers that may be restricted to cultural resources personnel and shared on an as needed basis to protect the integrity of the site.	11	
55. Is cultural resources information associated with the installation's historic real property assets (buildings, objects, etc.) recorded in GIS?	Yes				
56. Please provide any comments on changes in any of the data from previous fiscal year, or other issues, that will assist in HQDA's review of the data.			Q37: five of the previously identified sites were re-evaluated this year, along with the six newly identified sites. KMR was re-surveyed and sites re-evaluated in FY14 - the previous surveys were all very old (10-15+ years), and we felt the need to have a good baseline survey of our sites again, especially to see if all previously identified sites retained enough integrity to still be eligible.		

APPENDIX H

RESOURCE ESTIMATE “FOR OFFICIAL USE ONLY”

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Fed FY	PN	Project/Action	State: CIP	State: Plans	State: Design	State: Construct	State: Equip't	State Total: CIP	State Total: O&M	Fed: Plans	Fed: Design	Fed: SRM Construct	Fed: Minor Construct	Fed: Equip't	Fed Total \$	Project Total
FY13	N/A	Hanapepe Topographic Survey for Future Projects - Plans (50%/50%)	Upgrade			(\$25,000)		(\$25,000)		(\$25,000)					(\$25,000)	(\$50,000)
FY13	150023	Kalaeloa AASF Ph 1 - Construction (State CIP for OBI)	AASF		(\$446,763)	(\$4,467,631)	(\$25,000)	(\$4,939,394)				(\$25,782,000)	(\$901,000)		(\$26,683,000)	(\$31,622,394)
FY13	15110009	Kalaeloa B117 Roof - Design (L Chan) (100% but use CIP)	CRF Pending		(\$70,000)			(\$70,000)							\$0	(\$70,000)
FY13	15130011	Kalaeloa B19 Ph2 - Construction (75%/25%) (CRF-8/24/12)	Upgrade: B-11-440-G			(\$235,000)		(\$235,000)				(\$705,000)			(\$705,000)	(\$940,000)
FY13	15110011	Kalaeloa B46 Reno Ph1 - Construction (75%/25%)	Upgrade			(\$1,000,000)	(\$25,000)	(\$1,025,000)				(\$3,000,000)	(\$750,000)		(\$3,750,000)	(\$4,775,000)
FY13	15130006	Kalaeloa Electrical E1, Utility Phase C - Construction (75%/25%)	Min Con			(\$775,000)		(\$775,000)							(\$2,325,000)	(\$3,100,000)
FY13	15140004	Kalaeloa Potable Water P1, Utility Phase A - Construction (75%/25%)	Min Con			(\$937,500)		(\$937,500)				(\$2,812,500)			(\$2,812,500)	(\$3,750,000)
FY13	15130006	Kalaeloa Utility - SIOH (HDR Supplement 1) (75% Fed/25% State)	Min Con			(\$50,000)		(\$50,000)				(\$150,000)			(\$150,000)	(\$200,000)
FY13	15140005	Kalaeloa Wastewater W1, Utility Phase A - Construction (75%/25%)	Min Con			(\$247,000)		(\$247,000)				(\$741,000)			(\$741,000)	(\$988,000)
FY13	15100013	Kaunakakai Armory ADA - Construction (50%/50%)	ADA			(\$70,000)		(\$70,000)				(\$70,000)			(\$70,000)	(\$140,000)
FY13	15100011	Keauu About Face Facility ADA (100%State only)	ADA			(\$240,000)		(\$240,000)							\$0	(\$240,000)
FY13	15100012	Kealakekua Armory ADA - Construction (50%/50%)	ADA			(\$141,500)		(\$141,500)				(\$141,500)			(\$141,500)	(\$283,000)
FY13	N/A	Kekaha Range Topographic Survey - Plans (100% Fed)	Upgrade					\$0		(\$50,000)					(\$50,000)	(\$50,000)
FY13		KMR Catonement Ph2 & MV Shed Fence - Construction DB (75%/25%)	Upgrade			(\$65,000)		(\$65,000)					(\$195,000)		(\$195,000)	(\$260,000)
FY13	CA-1240	KMR Topographic Survey - Plans (75%/25%) (CRF 6/14/12)	Upgrade			(\$37,500)		(\$37,500)		(\$112,500)					(\$112,500)	(\$150,000)
FY13	N/A	Ukumehame Range Topographic Survey - Plans (100% Fed)	Upgrade					\$0		(\$80,000)					(\$80,000)	(\$80,000)
FY13	N/A	Waiawa Topographic Survey - Plans (75%/25%)	Upgrade			(\$18,750)		(\$18,750)		(\$56,250)					(\$56,250)	(\$75,000)
FY14		Hanapepe FMS Shop (UMMC project) - Design (100% of 2085 funding or 100% State)	Upgrade			(\$250,000)		(\$250,000)							\$0	(\$250,000)
FY14	15130008	Kalaeloa B117 High Bay Wdw - Construction (100%) (CWE - 7/16/12)	B117			(\$400,000)		(\$400,000)				(\$2,632,453)			(\$2,632,453)	(\$3,032,453)
FY14	15110009	Kalaeloa B117 Roof - Construction (100%) (CRF - 6/18/12 - Cancelled)	B117: B-11-432-G			(\$1,000,000)		(\$1,000,000)			(\$7,000,000)				(\$7,000,000)	(\$8,000,000)
FY14		Kalaeloa B282 Design	Min Con			(\$500,000)		(\$500,000)				(\$1,500,000)			(\$1,500,000)	(\$2,000,000)
FY14		Kalaeloa CERFP Storage - Construction DB (100%)	Upgrade					\$0					(\$750,000)		(\$750,000)	(\$750,000)
FY14	15150001	Kalaeloa Electrical E2, Utility Phase D - Construction (75%/25%)	Min Con			(\$775,000)		(\$775,000)				(\$2,325,000)			(\$2,325,000)	(\$3,100,000)
FY13		Kalaeloa MV Parking	Min Con			(\$166,667)		(\$166,667)					(\$500,000)		(\$500,000)	(\$666,667)
FY14		Kalaeloa Organizational Parking - Construction DB (100%)	Min Con					\$0					(\$750,000)		(\$750,000)	(\$750,000)
FY14	15150002	Kalaeloa Potable Water P2, Utility Phase B - Construction (75%/25%)	Min Con			(\$832,500)		(\$832,500)				(\$2,497,500)			(\$2,497,500)	(\$3,330,000)
FY14	15130006	Kalaeloa Utility - Design & SIOH (HDR Supplement 2) (75%/25%)	Min Con			(\$300,000)		(\$300,000)				(\$900,000)			(\$900,000)	(\$1,200,000)
FY14	15150003	Kalaeloa Wastewater W2, Utility Phase B - Construction (75%/25%)	Min Con			(\$293,750)		(\$293,750)				(\$881,250)			(\$881,250)	(\$1,175,000)
FY14	15130007	KMR B621 - Construction (100%) -	Upgrade					\$0				(\$7,000,000)			(\$7,000,000)	(\$7,000,000)
FY14		KMR B621 Billet Ph1 - Construction (100%)	Upgrade			(\$750,000)		(\$750,000)					(\$750,000)		(\$750,000)	(\$1,500,000)
FY14		KMR Range Fence - Construction DB (100%)	Upgrade					\$0				(\$1,400,000)			(\$1,400,000)	(\$1,400,000)
FY14		Ruger B306 Roof Replacement - Design (50%/50%)	Upgrade			(\$50,000)		(\$50,000)			(\$50,000)				(\$50,000)	(\$100,000)
FY14	15130003	Wahiawa Storage, B14 - Construction DB (75%/25%)	Upgrade			(\$250,000)		(\$250,000)				(\$750,000)			(\$750,000)	(\$1,000,000)
FY14		Waiawa Electrical Replacement & Grading - Design (75%/25%)	Upgrade			(\$50,000)		(\$50,000)			(\$150,000)				(\$150,000)	(\$200,000)
FY14	15120003	Waiawa Unit Storage, B38 - Construction DB (75%/25%)	Upgrade			(\$250,000)		(\$250,000)					(\$750,000)		(\$750,000)	(\$1,000,000)
FY14		Waiawa UTES Add/Alt - Design (100%)	Upgrade					\$0			(\$500,000)				(\$500,000)	(\$500,000)
FY15	15110011	Kalaeloa B46 Reno Ph2 - Construction (75%/25%)	Upgrade			(\$1,000,000)	(\$25,000)	(\$1,025,000)				(\$3,000,000)	(\$750,000)		(\$3,750,000)	(\$4,775,000)
FY15		Kalaeloa B46 Roof - Design (75%/25%)	Upgrade			(\$25,000)		(\$25,000)				(\$75,000)			(\$75,000)	(\$100,000)
FY15		Kalaeloa Entry Guard Booth, Fence & Gate Replacement - Construction (75%/25%)	Upgrade			(\$40,000)		(\$40,000)				(\$120,000)			(\$120,000)	(\$160,000)
FY15	15130009	Kalaeloa Storage, B129 - Construction DB (75%/25%)	Upgrade			(\$250,000)		(\$250,000)				(\$750,000)			(\$750,000)	(\$1,000,000)
FY15		Kalaeloa Stormwater SW1 - Construction (75%/25%)	Min Con			(\$52,750)		(\$52,750)				(\$158,250)			(\$158,250)	(\$211,000)
FY16		Hanapepe FMS Shop - Construction & Equipment (100%)	Upgrade			(\$250,000)	(\$50,000)	(\$300,000)				(\$1,990,000)			(\$1,990,000)	(\$2,290,000)
FY16		Kalaeloa B19 Parking - Construction	Upgrade			(\$87,500)		(\$87,500)				(\$262,500)			(\$262,500)	(\$350,000)
FY16		Kalaeloa B282 Renovation Ph1 - Construction & Equipment (75%-25% 2065)	Min Con			(\$2,333,333)	(\$25,000)	(\$2,358,333)				(\$7,000,000)	(\$750,000)		(\$7,750,000)	(\$10,108,333)
FY16		Kalaeloa Perimeter Fence Replacement - Construction DB (75%/25%)	Upgrade			(\$100,000)		(\$100,000)				(\$280,000)			(\$280,000)	(\$380,000)
FY16	15160002	Kalaeloa Potable Water P3 - Construction (75%/25%)	Min Con			(\$657,500)		(\$657,500)				(\$1,972,500)			(\$1,972,500)	(\$2,630,000)
FY16	15130006	Kalaeloa Utility - Design & SIOH (HDR Supplement 3) (75%-25%)	Min Con			(\$300,000)		(\$300,000)				(\$900,000)			(\$900,000)	(\$1,200,000)
FY16	15160003	Kalaeloa Wastewater W3 - Construction (75%/25%)	Min Con			(\$362,750)		(\$362,750)				(\$1,088,250)			(\$1,088,250)	(\$1,451,000)
FY16		RTI Classroom Carpet Replacement - Construction (100%)	Upgrade					\$0				(\$125,000)			(\$125,000)	(\$125,000)
FY16		Ruger B306 Roof Replace - Construction (50%/50%)	Upgrade			(\$125,000)		(\$125,000)				(\$125,000)			(\$125,000)	(\$250,000)
FY16		Waiawa Electrical Replacement & Grading - Construction (75%/25%)	Upgrade			(\$75,000)		(\$75,000)			(\$225,000)				(\$225,000)	(\$300,000)
FY16		Waiawa UTES Add/Alt - Construction (100%)	Upgrade				(\$50,000)	(\$50,000)				(\$3,000,000)	(\$750,000)		(\$3,750,000)	(\$3,800,000)
FY17		Kalaeloa B1784 Reno - Design (75%/25%)	Upgrade			(\$112,500)		(\$112,500)				(\$337,500)			(\$337,500)	(\$450,000)
FY17		Kalaeloa B46 Roof - Construction (75%/25%)	Upgrade			(\$125,000)		(\$125,000)				(\$375,000)			(\$375,000)	(\$500,000)
FY17		Kalaeloa Electrical E3 - Construction (75%/25%)	Min Con			(\$775,000)		(\$775,000)				(\$2,325,000)			(\$2,325,000)	(\$3,100,000)

Fed FY	PN	Project/Action	State: CIP	State: Plans	State: Design	State: Construct	State: Equip't	State Total: CIP	State Total: O&M	Fed: Plans	Fed: Design	Fed: SRM Construct	Fed: Minor Construct	Fed: Equip't	Fed Total \$	Project Total
FY17		Kalaeloa Recreational Parking Lot - Design (75%/25%)	Min Con			(\$100,000)		(\$100,000)				(\$300,000)			(\$300,000)	(\$400,000)
FY17		Kalaeloa Stormwater SW2 - Construction (75%/25%)	Min Con			(\$492,000)		(\$492,000)				(\$1,476,000)			(\$1,476,000)	(\$1,968,000)
FY17	15120034	Pearl City B1 Roof Replacement - Construction (50%/50%)	Upgrade			(\$250,000)		(\$250,000)			(\$250,000)				(\$250,000)	(\$500,000)
FY17	15120035	Pearl City B2 Roof Replacement - Construction (50%/50%)	Upgrade			(\$250,000)		(\$250,000)			(\$250,000)				(\$250,000)	(\$500,000)
FY18		Kalaeloa B282 Renovation Ph2 - Construction & Equipment	Min Con			(\$1,000,000)	(\$25,000)	(\$1,025,000)				(\$3,000,000)	(\$750,000)		(\$3,750,000)	(\$4,775,000)
FY18		Kalaeloa CST Add/Alt (100%)	Upgrade					\$0					(\$750,000)		(\$750,000)	(\$750,000)
FY18		Kalaeloa Non-Potable NP1 - Construction (75%/25%)	Min Con			(\$564,000)		(\$564,000)				(\$1,692,000)			(\$1,692,000)	(\$2,256,000)
FY18	15170002	Kalaeloa Potable Water P4 - Construction (75%/25%)	Min Con			(\$405,000)		(\$405,000)				(\$1,215,000)			(\$1,215,000)	(\$1,620,000)
FY18	15170003	Kalaeloa Wastewater W4 - Construction (75%/25%)	Min Con			(\$188,500)		(\$188,500)				(\$565,500)			(\$565,500)	(\$754,000)
FY19		Kalaeloa B1784 Reno - Construction & Equipment (75%/25%)	Min Con			(\$1,000,000)	(\$12,500)	(\$1,012,500)				(\$3,000,000)			(\$3,000,000)	(\$4,012,500)
FY19		Kalaeloa Non-Potable NP2 - Construction (75%/25%)	Min Con			(\$302,000)		(\$302,000)				(\$906,000)			(\$906,000)	(\$1,208,000)
FY19		Kalaeloa Recreational Parking Lot - Construction (75%/25%)	Min Con			(\$250,000)		(\$250,000)				(\$750,000)			(\$750,000)	(\$1,000,000)
FY19		Kalaeloa Stormwater SW3 - Construction (75%/25%)	Min Con			(\$368,250)		(\$368,250)				(\$1,104,750)			(\$1,104,750)	(\$1,473,000)
FY20		Kalaeloa B282 Renovation Ph3 - Construction & Equipment (75%/25%)	Min Con			(\$1,000,000)	(\$25,000)	(\$1,025,000)				(\$3,000,000)	(\$750,000)		(\$3,750,000)	(\$4,775,000)
FY20		Kalaeloa Stormwater SW4 - Construction (75%/25%)	Min Con			(\$653,500)		(\$653,500)				(\$1,960,500)			(\$1,960,500)	(\$2,614,000)
FY20		Kalaeloa Wastewater W5 - Construction (75%/25%)	Min Con			(\$379,250)		(\$379,250)				(\$1,137,750)			(\$1,137,750)	(\$1,517,000)
FY21		Kalaeloa Non-Potable NP3 - Construction (75%/25%)	Min Con			(\$382,500)		(\$382,500)				(\$1,147,500)			(\$1,147,500)	(\$1,530,000)
FY22		Kalaeloa Non-Potable NP4 - Construction (75%/25%)	Min Con			(\$201,750)		(\$201,750)				(\$605,250)			(\$605,250)	(\$807,000)
FY22		Kalaeloa Stormwater SW5 - Construction (75%/25%)	Min Con			(\$695,500)		(\$695,500)				(\$2,086,500)			(\$2,086,500)	(\$2,782,000)
FY23		Kalaeloa Non-Potable NP5 - Construction (75%/25%)	Min Con			(\$520,000)		(\$520,000)				(\$1,560,000)			(\$1,560,000)	(\$2,080,000)
FY28		Kalaeloa B19 Roof Replacement - Design (75%/25%)	Upgrades		(\$144,000)			(\$144,000)			(\$144,000)				(\$144,000)	(\$288,000)
Cultural Resources Compliance Actions Coding																
		Notify SHPO, NHO, external stakeholders of ground disturbing activities. Follow best managment & inadvertant discoveries proceedures; consult as needed														
		Consult with SHPO, NHO, and stakeholders of proposed undertakings														

APPENDIX I

CULTURAL RESOURCES LAWS AND REGULATIONS

AR 200-1 is available at: http://www.army.mil/usapa/epubs/pdf/r200_1.pdf

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Cultural Resources Laws and Regulations

Cultural resources are defined as historic properties in the NHPA; as cultural items in the NAGPRA; as archaeological resources in ARPA; as sacred sites (to which access is provided under the American Indian Religious Freedom Act of 1978 [AIRFA]) in EO 13007; and as collections and associated records in 36 *Code of Federal Regulations* (CFR) Part 79, *Curation of Federally Owned and Administered Collections*. Requirements set forth in NEPA, the NHPA, ARPA, NAGPRA, AIRFA, 36 CFR Part 79, EO 13007, EO 13175, and their implementing regulations, define the HIARNG's compliance responsibilities for management of cultural resources. AR 200-1 specifies Army policy for cultural resources management. The following list of federal statutes and regulations are applicable to the management of cultural resources at HIARNG sites.

I.1 Brief Overview

I.1.1 Federal Laws and Regulations

All federal laws, regulations, and major court decisions can be accessed online from Cornell University Law Library at <http://www.law.cornell.edu/>. All Army regulations, pamphlets, publications, and forms can be accessed online at: <http://aec.army.mil/usace/cultural/index/>. The HIARNG is not responsible for the content of referenced Web sites.

- National Environmental Policy Act of 1969. NEPA sets forth a national policy that encourages and promotes productive harmony between humans and their environment. NEPA procedures require that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The NEPA process is intended to help public officials make decisions that are based on an understanding of environmental consequences and take actions that protect, restore, and enhance the environment. NEPA also provides opportunities for input from NHOs and the public into the decision making process. Regulation 40 CFR 1500–1508 establishes the policy requirements that are binding on all federal agencies for implementing NEPA. Additional guidance on how to complete the NEPA process is provided in the NEPA Handbook developed by the NEPA Committee of the Environmental Advisory Council [GKO/ARNG/G-4/Conservation/NEPA/Guidance/2006 Version of NEPA Handbook]. This ICRMP is subject to NEPA analysis and documentation requirements. The Environmental Assessment (EA) and Finding of No Significant Impact (FNSI) prepared for the 2008-2012 ICRMP are considered to remain valid for the ICRMP Update; therefore, additional NEPA review completed for the ICRMP Update is restricted to an internal REC, provided with a copy of the FNSI for the 2008-2012 ICRMP; and review correspondence in Appendix B.
- National Historic Preservation Act of 1966, as amended. The NHPA establishes the federal government's policy to provide leadership in the preservation of historic properties and to administer federally owned or controlled historic properties in the spirit of stewardship. Regulation 36 CFR 800 sets forth the procedural requirements to identify, evaluate, and determine effects of all undertakings on historic properties.
- Curation of Federally Owned and Administered Archaeological Collections. Regulation 36 CFR Part 79 defines collections and sets forth the requirements for processing, maintaining, and

curating archaeological collections. However, NAGPRA cultural items and human remains shall be managed in accordance with NAGPRA and 43 CFR 10.

- Antiquities Act of 1906. This act provides information on penalties for damage and destruction of antiquities.
- Archaeological Resources Protection Act of 1979. ARPA provides for the protection of archaeological resources and sites that are on public lands and American Indian lands and fosters increased cooperation and exchange of information.
- Archaeological and Historic Preservation Act of 1974 (AHPA). This act provides for the preservation of historical and archaeological data, including relics and specimens.
- Native American Graves Protection and Repatriation Act of 1990, as amended. NAGPRA provides guidelines on the ownership or control of American Indian cultural items and human remains that are excavated or discovered on federal or tribal lands after 16 November 1990. 43 CFR 10 sets forth the requirements and procedures to carry out the provisions of NAGPRA.
- American Indian Religious Freedom Act of 1978. AIRFA provides for the protection and preservation of traditional religions of American Indians.
- Presidential Memorandum dated 29 April 1994. Government-to-Government Relations with Native American Tribal Governments. This memorandum outlines the principles that executive departments and agencies are to follow in their interactions with American Indian tribal governments.
- Executive Order 11593 – Protection and Enhancement of the Cultural Environment. This EO orders the federal government to provide leadership in preserving, restoring, and maintaining the historic and cultural environment of the nation by initiating measures necessary to preserve, restore, and maintain (for the inspiration and benefit of the people) federally owned sites, structures, and objects of historical, architectural, or archaeological significance.
- Executive Order 13006 – Locating Federal Facilities on Historic Properties in our Nation’s Central Cities. This EO orders the federal government to utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in central business areas.
- Executive Order 13007 – Indian Sacred Sites. This EO guides each executive branch agency on accommodating access to and ceremonial use of American Indian sacred sites by American Indian religious practitioners, and avoiding adversely affecting the physical integrity of such sacred sites.
- Executive Order 13175 – Consultation and Coordination with Indian Tribal Governments. This EO directs the federal government to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, strengthen the United States government-to-government relationships with NHOs and reduce the imposition of unfunded mandates upon such groups.

- Executive Order 13287 – Preserve America. This EO directs the federal government to provide leadership in preserving America’s heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the federal government; promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties; inventorying resources; and promoting ecotourism.
- Executive Order 13327 – Federal Real Property Asset Management. Expressing the goal of promoting efficient and economical use of real property assets and ensuring management accountability and reforms, EO 13327 requires federal agencies to develop and submit asset management plans, incorporating the management requirements for historic property found in EO 13287 (3 March 2003) and the environmental management requirements found in EO 13148 (21 April 2000). The new EO also establishes the Federal Real Property Council, which is tasked to consider environmental costs associated with ownership of property, including restoration and compliance costs.
- Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management. Expressing the goal of strengthening the environmental, energy, and transportation management of Federal agencies, EO 13423 requires Federal agencies to conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.
- Executive Order (EO) 13423 (24 January 2007) – Strengthening Federal Environmental, Energy, and Transportation Management. Expressing the goal of strengthening the environmental, energy, and transportation management of Federal agencies, EO 13423 requires Federal agencies to conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.

I.1.2 Department of Defense, Army and ARNG Guidance and Regulations

- Department of Defense Instruction 4715.3 – Environmental Conservation Program. This instruction implements policy, assigns responsibility, and prescribes procedures for the integrated management of natural and cultural resources on property under DoD control. This instruction is currently being revised; a draft of the revised instruction is anticipated in Fiscal Year (FY) 2008.
- Department of Defense Instruction 4710.02 – DoD Interactions with Federally-Recognized Tribes. This instruction implements DoD policy, assigns responsibilities, and provides procedures for DoD interactions with federally recognized tribes (hereafter referred to as “Tribes”) in accordance with DoD Directive 5134.01, DoD Directive 4715.1E, DoDI 4715.3, Secretary of Defense Policy dated October 20, 1998, EO 13175, and the Presidential Memorandum dated September 23, 1994. NHOs are included under this instruction and are referred to as such throughout this ICRMP and not as tribes.
- DoDI 4710.03– DoD Consultation with Native Hawaiian Organizations (25 October 2011). This instruction establishes policy and addresses the policies and interactions that govern consultation between NHOs and DoD, establishes a framework for consultation and provides

the DoD components in Hawaii with a framework to develop localized processes to facilitate consultation.

- DoDI 4715.16 – Cultural Resources Management (18 September 2008). This instructs management of cultural resources in a sustainable manner that considers the preservation of historic, archaeological, architectural, and cultural values.
- 32 CFR 651, Environmental Analysis of Army Actions. This regulation sets forth policy, responsibilities, and procedures for integrating environmental considerations into Army planning and decisionmaking, thus implementing CEQ regulations. This regulation is used to prepare the EA to implement the ICRMP.
- Army Regulation 200-1 – Environmental Protection and Enhancement. This regulation covers environmental protection and enhancement and provides the framework for the Army Environmental Management System. This regulation addresses environmental responsibilities of all Army organizations and agencies. Chapter 6 regulation establishes the Army’s policy for managing cultural resources to meet legal compliance requirements and to support the military mission. AR 200-1 supersedes AR 200-4.
- Department of Defense Minimum Antiterrorism Standards for Buildings (UFC 4-010-01). These standards provide appropriate, implementable, and enforceable measures to establish a level of protection against terrorist attacks for all inhabited DoD buildings where no known threat of terrorist activity currently exists.
- National Guard Bureau – ARE-C All States Letter (P02-0058) – Cultural Resources Management Policy Guidance. This letter provides guidance for ICRMPs, the annual update process, and future ICRMPs. It also identifies nationwide goals for cultural resources programs.
- National Guard Bureau – ARE-C ICRMP Guidance (see Appendix K).

I.1.3 Federal Memoranda, Program Comments, and Agreements

This section summarizes policy documents, memoranda, and agreements affecting the HIARNG at the national level.

- World War II Temporary Buildings Programmatic Agreement (PA) (1986). The 1986 PA on World War II-era temporary buildings addresses these standardized buildings as a class in evaluation and documentation. The PA prescribes when demolition may proceed without further action and when the State Historic Preservation Officer (SHPO) shall review the undertaking. Specifically, the PA allows demolition without further consultation for World War II-era temporary buildings; projects involving renovation, repair, rehabilitation, or movement of these buildings remain undertakings that require consultation with the SHPO. As part of the implementation of this PA, the Historic American Building Survey (HABS) documented representative examples of World War II-era temporary buildings across the United States. The majority of representative examples selected for documentation occurred at three facilities: Fort McCoy in Wisconsin, Fort Drum in New York, and Camp Edwards in Massachusetts.

- Program Comment for WWII and Cold War Era Facilities (1939-1974) Army Ammunition Production Facilities and Plants (2006). This Program Comment provides the Army with an alternative method of compliance with Section 106 and with regard to the effect of management actions on World War II (WWII) and Cold War Era Army Ammunition Production Facilities and Plants that may be eligible for listing on the National Register of Historic Places (NRHP) (Facilities and Plants): ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.
- Nationwide PA for Army National Guard (ARNG) Readiness Centers Maintenance and Repair (2010). The PA for ARNG Readiness Centers applies to both federally- and state-owned Readiness Centers (previously designated as Armories) that are 50 years old or older, or that are considered eligible under NRHP criterion consideration G (Exceptional Significance). The terms of the Nationwide PA apply to ARNG undertakings concerning the maintenance and treatment, rehabilitation, renovation, and mothballing of Readiness Centers and associated structures and featured landscapes. The stipulations of the PA include a list of ARNG actions considered to be exempt from Section 106 review, a list of ARNG undertakings that could be completed with an expedited Section 106 review process, and procedures for undertakings not covered by the expedited review process. A national historic context document and a condition assessment of ARNG Readiness Centers were prepared as supporting documents for this PA.
- National Guard Bureau – ARNG Cultural Resources Handbook (2013). This handbook establishes cultural resource identification priorities and evaluation standards for all ARNG installations, and provides a schedule to accomplish program objectives. Central to this purpose is the identification of cultural resources and determination of the resources' eligibility for listing in the NRHP. Cultural resources under the stewardship of an installation might consist of archaeological sites, cultural landscapes, documents, buildings and structures, Native American sacred sites, and properties of traditional, religious, and cultural significance, including artifacts collected during previous projects. A successful cultural resource management program requires projects to identify resources, implement protection and compliance actions, and consult with internal and external stakeholders. This handbook provides guidance and supports the ARNG cultural resource management program in achieving regulatory compliance and ensuring that ARNG stewardship responsibilities are met.
- National Guard Bureau – Memorandum for Environmental Managers (15 May 2012). This memorandum updates the ARNG Environmental Division (ARNG-ILE) guidance to the state ARNG Environmental Offices on their cultural resources compliance requirements for the National Historic Preservation Act (NHPA) associated with the completion of National Environmental Policy Act (NEPA) Records of Consideration (RECs) and guidance using Categorical Exclusions to comply with NEPA.
- National Guard Bureau – NBG-ARE - Memorandum for Environmental Program Manager (EPM) of all States, Puerto Rico, the US Virgin Islands, Guam and the District of Columbia (2010). Establishes guidance for the update, revision, and implementation of ICRMP.

- National Guard Bureau – ARE-C All States Letter (P02-0058) – Cultural Resources Management Policy Guidance. This letter provides guidance for ICRMPs, the annual update process, and future ICRMPs. It also identifies nationwide goals for cultural resources programs.
- National Guard Bureau – ARE-C ICRMP Guidance (see Appendix K).
- Presidential Memorandum for Heads of Executive Departments and Agencies Dated April 29, 1994: Government-to-Government Relations with Native American Tribal Governments. This memorandum requires consultation between the HIARNG and NHOs on a government to government basis in an open and candid manner, formally and directly between the installation commander and the representative of the NHOs. This is achieved through formal written letters designating a Coordinator for Native Hawaiian Affairs who is authorized to continue consultation with the representative of the Native Hawaiian group or organization. Any decisions resulting from formal consultation will be formally transmitted to the Native Hawaiian group or organization by the installation commander. The HIARNG does not have a Coordinator for Native Hawaiian Affairs, however, the Cultural Resources Manager (CRM) and the Environmental Protection Manager (EPM) have been designated as the representatives of the installation commander to installation commanders consultation representatives in both Section 106 consultation under 36 CFR 800 and in this Presidential Memorandum.
- While this Presidential Memorandum is not specifically applicable to Native Hawaiians, the history of Native Hawaiian interactions with, and treatment by, the U.S. government, warrants that Native Hawaiians, through appropriate agencies such as the State of Hawaii's Office of Hawaiian Affairs (OHA), be afforded essentially the same government-to-government treatment and respect as federally recognized Indian tribes.

I.1.4 State and Local Laws and Regulations

The historic preservation laws in some states can be more restrictive than federal laws, and meeting the requirements of the state's regulations can require additional or more extensive compliance activities on the part of the agency conducting a federal undertaking (36 CFR 800.16[y]). States might also have cemetery laws to consider (for example, Arkansas Act 753 of 1991, as amended, makes it a class D felony offense to knowingly disturb a human grave). Readiness centers (armories) can be a contributing element or located within a historic district. Historic districts could have covenants or building codes. A list of certified local governments can be found at <http://www2.cr.nps.gov/clg/>.

In cases where a project is not a federal undertaking (36 CFR 800.16[y]) for which the HIARNG or another federal agency is responsible for compliance with NHPA or other requirements, compliance with state, local, city, county, or certified local government laws and regulations would be required. A common example of an action that generally does not involve compliance with federal regulations is an action such as maintenance, repairs, remodeling, or demolition of a historic building or land that is not owned or leased by the federal government, does not support a federal mission, and where no federal funding federal permit or other assistance is involved.

In cases where a project is a federal undertaking for which the HIARNG or another federal agency is responsible for compliance with NHPA or other requirements, both federal and state laws can apply. An example of this action is when the federal undertaking affects a historic property owned and managed

by the state. Another example is if the action occurs on state-owned land, state permits for archaeological work on state land could be required.

I.1.4.1 Hawaii Revised Statutes (HRS)

- **Chapter 6E, Historic Preservation** - The Constitution of the State of Hawaii recognizes the value of conserving and developing the historic and cultural property within the State for the public good. The legislature declares that the historic and cultural heritage of the State is among its important assets and that the rapid social and economic developments of contemporary society threaten to destroy the remaining vestiges of this heritage. The legislature further declares that it is in the public interest to engage in a comprehensive program of historic preservation at all levels of government to promote the use and conservation of such property for the education, inspiration, pleasure, and enrichment of its citizens. The legislature further declares that it shall be the public policy of this State to provide leadership in preserving, restoring, and maintaining historic and cultural property, to ensure the administration of such historic and cultural property in a spirit of stewardship and trusteeship for future generations, and to conduct activities, plans, and programs in a manner consistent with the preservation and enhancement of historic and cultural property. [L 1976, c 104, pt of §2]. <http://files.hawaii.gov/dlnr/shpd/rules/6E.pdf>
- **Amendment of Chapter 6E, Violations of Chapter 6E (2005)** - House Bill No. 712 was passed as an act relating to violations of Chapter 6E from disturbance, theft, alteration, or destruction of archaeological, cultural, or historical property, sites, and/or places or burial site covered by Chapter 6E. <http://state.hi.us/dlnr/hpd/hphrs/hb712.htm>
- **Section 171-36.1 Reservation of Rights to Prehistoric and Historic Remains on Leased Public Lands** - [§171-36.1] Reservation of rights to prehistoric and historic remains on leased public lands. The board of land and natural resources shall, in leases of public lands retain the rights to all prehistoric and historic remains found on such lands. [L 1969, c 216, §7] <http://files.hawaii.gov/dlnr/shpd/rules/171-36-1.pdf>
- **Section 171-36.2 Public Lands for Urban Historic Preservation and Restoration** - An act regarding historic preservation and restoration on public lands. http://www.state.hi.us/dlnr/hpd/hphrs/171_36_2.htm
- **Section 198 Conservation Easements** - Established procedures by which historic properties are ordered and entered into the Hawaii Register of Historic Places (HRHP) through a review board. Review board also conducts reviews of NRHP nominations. <http://files.hawaii.gov/dlnr/shpd/rules/198.pdf>
- **Section 205-17 Land Use Commission Decision making Criteria** - Mandated that the impacts of reclassification of district boundaries on the maintenance of valued cultural, historical, or natural resources be considered, with provisions for employment opportunities and economic development, and for low and mixed income housing <http://files.hawaii.gov/dlnr/shpd/rules/205-17.pdf>
- **Section 205A-2 Coastal Zone Management Program; Objectives and Policies** - Provided objectives and policies for historic preservation in the State coastal zone management program. Set protection, preservation, restoration, research, documentation, and management goals for significant Hawaiian and American archaeological, historical, and cultural sites, places, and materials. <http://files.hawaii.gov/dlnr/shpd/rules/205A-2.pdf>

- **Section 206E-33 Kakaako Community Development District; Development Guidance Policies** - Provides development guidance policies of the authority's action in the Kakaako community development district. Mandated that historic sites and culturally significant facilities, settings, or locations be preserved. <http://files.hawaii.gov/dlnr/shpd/rules/206E-33.pdf>
- **Section 226-12 Objectives and Policies for the Physical Environment** - Scenic, Natural Beauty, and Historic Resources Created objectives and policies for the planning of the State's physical environment and set preservation, restoration, incentives, protection, and management goals that enhanced Hawaii's scenic assets, natural beauty, and multi-cultural/historical resources. Encouraged land use practices that were complimentary to the State's physical environment. <http://files.hawaii.gov/dlnr/shpd/rules/226-12.pdf>
- **Section 246-34 Exemption, Dedicated Lands in Urban Districts** - Provides special tax exemption privilege to any land owner (taxable real property) in an urban district that dedicates land to benefit to the public (for landscaping, open spaces, public recreation, and other similar uses), that are compliant with setback, open space, and zoning and building code laws and ordinances, and that the benefit is at least equal to the value of the real property taxes, including cost of improvements, continuing maintenance, and other pertinent factors. It constitutes forfeiture if the land is dedicated as having a benefit to the public at least equal to the value of the real property taxes of the dedicated property. <http://files.hawaii.gov/dlnr/shpd/rules/246-34.pdf>
- **Section 343-5 Environmental Impact Statements, Applicability and Requirements** - Provides a list of actions requiring environmental assessments and provided framework for carrying out an environmental assessment in advance of the proposed action. <http://files.hawaii.gov/dlnr/shpd/rules/343-5.pdf>

I.1.4.2 Hawaii Administrative Rules (HAR)

- **Chapter 197: Hawai'i Historic Places Review Board** - §13-197-1 Purpose. This chapter governs the practice of and the procedures before the Hawaii historic places review board under Chapter 91, Hawaii Revised Statutes. [Eff. 6/22/81; am and comp 3/9/89] (Auth: HRS §§6E-5.5, 91-2) (Imp: HRS §§91-2, 91-5, 91-6, 91-8) <http://files.hawaii.gov/dlnr/shpd/rules/197.pdf>
- **Chapter 198: Hawai'i and National Register of Historic Places Programs** - The purpose of this chapter is to set forth the procedures by which historic properties shall be ordered and entered into the Hawaii register of historic places by the review board and by which nominations of historic properties to the national register will be approved by the review board. <http://files.hawaii.gov/dlnr/shpd/rules/198.pdf>
- **Chapter 275: Rules Governing Procedures for Historic Preservation Review for Governmental Projects Covered Under Sections 6E-7 and 6E-8, HRS** - To promote use and conservation of historic properties for the benefit of the citizens of Hawaii. Established historic preservation review process for state and county projects. The process identifies historic properties in project area, assesses potential negative impacts, and develop and execute plans to mitigate negative impacts to historic properties <http://files.hawaii.gov/dlnr/shpd/rules/275.pdf>
- **Chapter 276: Rules Governing Standards for Archaeological Inventory Surveys and Reports** - Established standards for archaeology surveys and other reports required under Chapter 13-275 and 13-284 for the historic preservation review process. <http://files.hawaii.gov/dlnr/shpd/rules/276.pdf>

- **Chapter 277: Rules Governing Requirements for Archaeological Site Preservation and Development** - Provides standards for preservation approaches to ensure historic preservation is being undertaken in the public interest. <http://files.hawaii.gov/dlnr/shpd/rules/277.pdf>
- **Chapter 278: Rules Governing Standards for Archaeological Data Recovery Studies and Reports** - Created uniform standards for data recovery studies and reports to ensure that quality mitigation measures are performed in the best interest of the public. <http://files.hawaii.gov/dlnr/shpd/rules/278.pdf>
- **Chapter 279: Rules Governing Standards for Archaeological Monitoring Studies and Reports** - Created uniform standards for archaeological monitoring studies and monitoring reports. The standards are in place to ensure quality archaeological monitoring is performed in the best interest of the public. <http://files.hawaii.gov/dlnr/shpd/rules/279.pdf>
- **Chapter 280: Rules Governing General Procedures for Inadvertent Discoveries of Historic Properties** - During a Project Covered by the Historic Preservation Review Process - Provided an expedited process for addressing inadvertent discoveries of historic properties, after an inventory or assessment level survey and not including human remains, in mitigation plans. <http://files.hawaii.gov/dlnr/shpd/rules/280.pdf>
- **Chapter 281: Rules Governing Professional Qualifications** - Established professional qualifications and review board for archaeologists, architects, architectural historians, ethnographers, historians, and physical anthropologists <http://files.hawaii.gov/dlnr/shpd/rules/281.pdf>
- **Chapter 282: Rules Governing Permits for Archaeological Work** - Created a permit system for archaeological fieldwork undertaken in Hawaii, not on federal lands. The permit ensures quality archaeological work, to obtain reports on all work for the Hawaii inventory of historic places, and to better protect historic properties in the public interest. <http://files.hawaii.gov/dlnr/shpd/rules/282.pdf>
- **Chapter 283: Rules Governing Standards for Osteological Analysis of Human Skeletal Remains** - Recognized human remains as being highly culturally significant and sensitivity. Established policies, procedures, and professional standards for osteological analysis of human remains and treatment of burials. <http://files.hawaii.gov/dlnr/shpd/rules/283.pdf>
- **Chapter 284: Rules Governing Procedures for Historic Preservation Review to Comment on Chapter 6E-42, HRS, Projects** - Established the rules for Chapter 6E historic preservation reviews of state and county projects that require permitting, licensing, certification, land use change, subdivision, or land use entitlement <http://files.hawaii.gov/dlnr/shpd/rules/284a.pdf>
- **Chapter 300: Rules of Practice and Procedure Relating to Burial Sites and Human Remains** - Established practice and procedure for the care and protection of burial sites found in the State before the island burial councils and the department of land and natural resources. To avoid future disputes arising from the discovery of human skeletal remains fifty years or older, sections 6E-11, 6E-12, 6E-43, 6E-43.5, 6E-43.6, HRS, were amended or enacted in part to provide additional protection for known Native Hawaiian burial sites of high preservation value such as areas with a concentration of skeletal remains, or prehistoric or historic burials associated with important individuals or events, that are within a context of historic properties, or have known lineal descendants. The photographing of human skeletal remains reasonably believed to be Native Hawaiian may take place only after consultation with known lineal descendants and the

appropriate council. [Eff SEP 28 1996] (Auth: HRS §6E-43.5) (Imp: HRS §§6E-43, 6E-43.5, 6E-43.6) <http://files.hawaii.gov/dlnr/shpd/rules/300.pdf>

- **Caves Protection Act** - Recognizes caves as caves are unique landforms that often contain irreplaceable resources of immense cultural, spiritual, aesthetic, and scientific value. The Act is to protect unique cultural and natural resources found in caves and does not limit other laws that address historic preservation and water quality, such as chapters 6E, 340E, and 342D of the Hawaii Revised Statutes. http://www.capitol.hawaii.gov/session2002/bills/SB2898_cd1_.htm

I.1.5 State Memoranda and Agreements

HIARNG does not have any state-specific Memoranda of Agreement (MOAs) or PAs negotiated with ACHP, SHPD, NHOs, or external stakeholders,

I.2 National Historic Preservation Act Guidance

I.2.1 Section 106

Section 470f. Effects of Federal Undertakings upon property listed in the NRHP; comment by the ACHP (the NHPA, Section 106) states:

The head of any federal agency having a direct or indirect jurisdiction over a proposed federal or federally assisted undertaking in any state and the head of any federal department or independent agency having authority to license an undertaking shall, prior to approval of the expenditure of any federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effects of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places. The head of any such federal agency shall afford the Advisory Council on Historic Preservation established under part B of this subchapter a reasonable opportunity to comment with regard to such undertaking.

Section 106 of the NHPA requires the “head of any federal agency having direct or indirect jurisdiction over a proposed federal or federally assisted undertaking in any state and the head of any federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. The head of any such federal agency shall afford the Advisory Council on Historic Preservation . . . a reasonable opportunity to comment with regard to such undertaking.”

For the HIARNG, this requirement applies to undertakings on federal property (lands or buildings) or state property with federal actions (such as funding or permits). Projects that have no federal involvement (e.g., no federal funding, no federal action, no federal permits, no federal property) do not fall under Section 106 of the NHPA; however, check state and local preservation laws and regulations (see **Appendix I.1**).

Consultation with the SHPO and/or the ACHP is a critical step in this process. If an undertaking on federal lands may affect properties having historic value to a Tribe, such Tribe shall be afforded the

opportunity to participate as consulting parties during the consultation process defined in 36 CFR 800 (see **Appendix I.3**).

The Section 106 process is designed to identify possible conflicts between historic preservation objectives and the proposed activity, and to resolve those conflicts in the public interest through consultation. Neither NHPA nor ACHP regulations require that all historic properties must be preserved. They only require the agency to consider the effects of the proposed undertaking on those properties and fulfill the procedural requirements for the NHPA prior to implementation.

Failure to take into account the effects of an undertaking on historic properties, and afford the ACHP a reasonable opportunity to comment on such effects, can result in formal notification from the ACHP to the head of the federal agency of foreclosure of the ACHP's opportunity to comment on the undertaking pursuant to NHPA. Litigation or other forms of redress can be used against the federal agency in a manner that can halt or delay critical activities or programs.

The ACHP provides the following summary of the Section 106 process (excerpted from www.achp.gov, **incorporates amendments effective Aug. 5, 2004**), as well as the flowchart provided as **Figure I-1**. Hotlinks included in the text are those provided by the ACHP.

- Introduction. Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in regulations issued by ACHP. Revised regulations, "Protection of Historic Properties" (36 CFR Part 800), became effective January 11, 2001, and are summarized below.
- Initiate Section 106 process. The responsible Federal agency first determines whether it has an undertaking that is a type of activity that could affect historic properties. Historic properties are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register. If so, the agency must identify the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer* (SHPO/THPO*) with whom to consult during the process. It should also plan to involve the public, and identify other potential consulting parties. If it determines that it has no undertaking, or that its undertaking is a type of activity that has no potential to affect historic properties, the agency has no further Section 106 obligations.
- Identify historic properties. If the agency's undertaking could affect historic properties, the agency determines the scope of appropriate identification efforts and then proceeds to identify historic properties in the area of potential effects. The agency reviews background information, consults with the SHPO/THPO* and others, seeks information from knowledgeable parties, and conducts additional studies as necessary. Districts, sites, buildings, structures, and objects listed in the National Register are considered; unlisted properties are evaluated against the National Park Service's published criteria, in consultation with the SHPO/THPO* and any Indian tribe or Native Hawaiian organization that may attach religious or cultural importance to them.

If questions arise about the eligibility of a given property, the agency may seek a formal determination of eligibility from the National Park Service. Section 106 review gives equal

consideration to properties that have already been included in the National Register as well as those that have not been so included, but that meet National Register criteria.

If the agency finds that no historic properties are present or affected, it provides documentation to the SHPO/THPO* and, barring any objection in 30 days, proceeds with its undertaking.

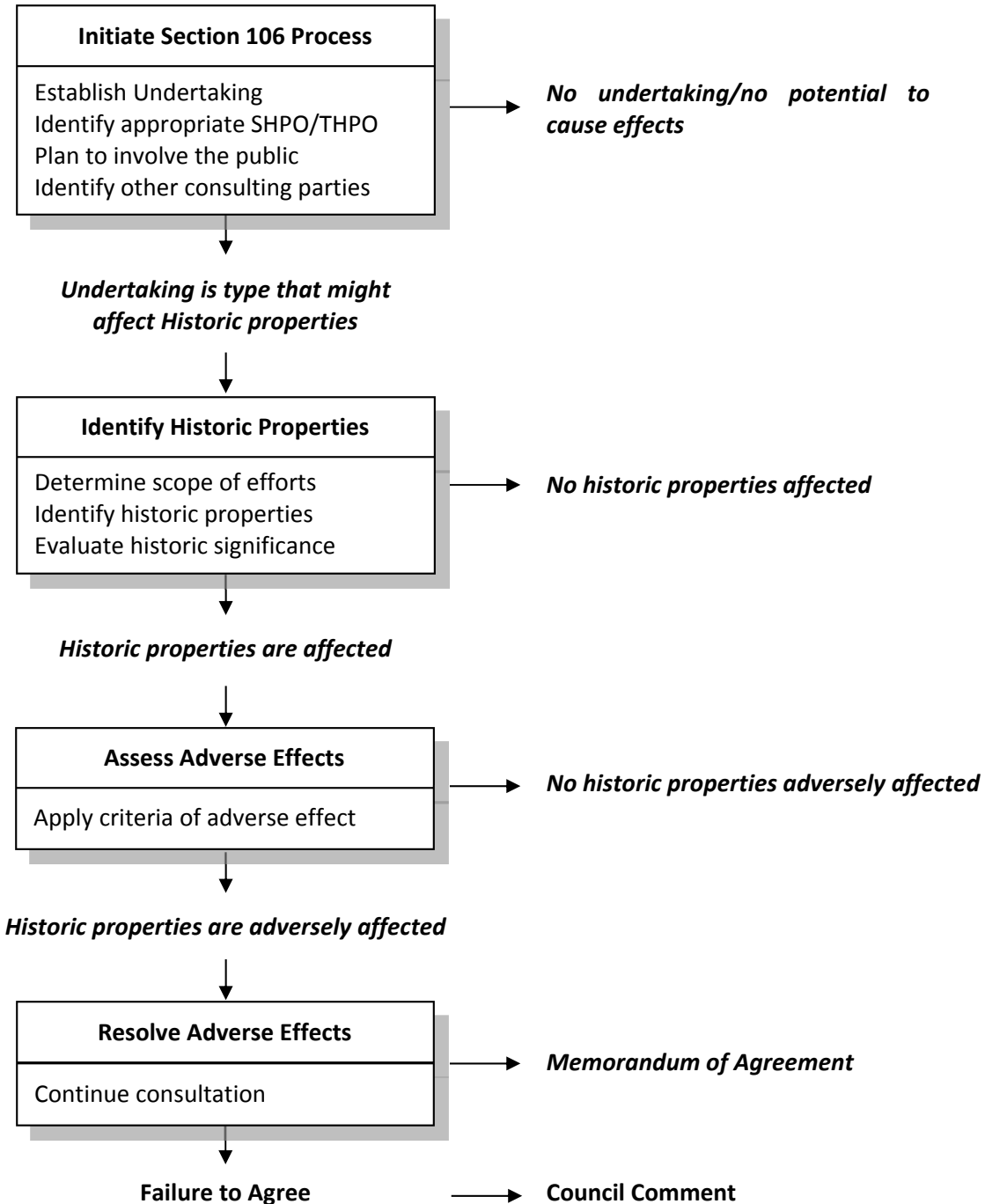
If the agency finds that historic properties are present, it proceeds to assess possible adverse effects.

- Assess adverse effects. The agency, in consultation with the SHPO/THPO*, makes an assessment of adverse effects on the identified historic properties based on criteria found in ACHP's regulations.

If they agree that there will be **no adverse effect**, the agency proceeds with the undertaking and any agreed-upon conditions.

- If they find that there is an adverse effect, or if the parties cannot agree and ACHP determines within 15 days that there is an adverse effect, the agency begins consultation to seek ways to avoid, minimize, or mitigate the adverse effects.
- Resolve adverse effects. The agency consults to resolve adverse effects with the SHPO/THPO* and others, who may include NHOs, local governments, permit or license applicants, and members of the public. ACHP may participate in consultation when there are substantial impacts to important historic properties, when a case presents important questions of policy or interpretation, when there is a potential for procedural problems, or when there are issues of concern to NHOs.

Consultation usually results in an MOA, which outlines agreed-upon measures that the agency will take to avoid, minimize, or mitigate the adverse effects. In some cases, the consulting parties may agree that no such measures are possible, but that the adverse effects must be accepted in the public interest.



Source: <http://www.achp.gov/regsflow.html>

Figure I-1. Section 106 Regulations Flow Chart.

- **Implementation.** If an MOA is executed, the agency proceeds with its undertaking under the terms of the MOA.
- **Failure to resolve adverse effects.** If consultation proves unproductive, the agency or the SHPO/THPO*, or ACHP itself, may terminate consultation. If a SHPO terminates consultation, the agency and ACHP may conclude an MOA without SHPO involvement. However, if a THPO* terminates consultation and the undertaking is on or affecting historic properties on tribal lands, ACHP must provide its comments. The agency must submit appropriate documentation to ACHP and request ACHP's written comments. The agency head must take into account ACHP's written comments in deciding how to proceed.
- **NHOs and the public.** Public involvement is a key ingredient in successful Section 106 consultation, and the views of the public should be solicited and considered throughout the process.
- The regulations also place major emphasis on consultation with NHOs in keeping with the 1992 amendments to NHPA. NHOs must be consulted about undertakings on or affecting their lands in addition to the SHPO.

Timing: The timing for identification surveys and evaluations in support of Section 106 undertakings will vary depending on the size and nature of the resources that may be affected by the undertaking, and the state of current knowledge (e.g., previous investigations) completed with the undertaking's Area of Potential Effect (APE). The CRM can anticipate 4 to 6 months to complete investigations involving small numbers of buildings or small land parcels, and longer for projects involving large numbers of buildings or larger land parcels.

Resolution of adverse effects (mitigation) could require an additional 6 to 12 months, depending on the complexity of the situation. In most cases, an MOA is developed. See **Appendix J** on agreement documents.

In Hawaii SHPO/THPO are replaced by SHPD, NHOs, and Stakeholders, and the process includes the public.

I.2.2 Emergencies

Per 36 CFR 800.12 (emergency situations), the timeline for Section 106 review of renovations and repairs to historic buildings can be substantially reduced if the renovation or repair is required as a result of an emergency situation (e.g., flooding, tornados, earthquakes, or hurricanes). **The reduction of the timeline only applies in those situations where the President or the Governor has declared an official state of emergency.** The CRM notifies the ACHP, SHPD, NHOs, and any other interested parties of the project; these parties then have 7 days rather than the traditional 30 days to comment on the undertaking. As a proactive measure, the HIARNG could also work with the ACHP, SHPO/THPO, and interested parties to develop a PA (see **Appendix J**) outlining streamlined procedures for emergency situations.

Procedures: The CRM will ensure that all reasonable efforts are made to avoid or minimize disturbance of significant cultural resources during emergency operations and will communicate with applicable

HIARNG personnel and SHPODNHOs regarding potential effects on significant cultural resources that could occur in association with such activities.

Upon notification of a proposed emergency operation, the CRM will notify the ACHP and consult with the SHPD and NHOs, as appropriate, regarding the known or likely presence of cultural resources in the area of the proposed operation. The ACHP, SHPD/NHOs are expected to reply (in 7 days or less). Notification may be verbal, followed by written communication. This applies only to undertakings that will be implemented within 30 days after the need for disaster or emergency has been formally declared by the appropriate authority. An agency may request an extension of the period of applicability prior to the expiration of the 30 days. The CRM will ensure that the heads of all units involved in the project are briefed regarding the protocol to be followed in the case of the inadvertent discovery of cultural resources during emergency operations.

Once the emergency has passed, the CRM will complete all appropriate actions to complete the Section 106 process, including submittal of any reports or correspondence documenting the actions taken.

I.2.3 BRAC Actions

The 2005 Base Realignment and Closure (BRAC) Commission issued 190 separate DoD recommendations, including 837 distinct and identifiable BRAC "close" or "realign" actions. The purpose of BRAC actions is to save money and promote jointness between the Services. What BRAC means to the HIARNG Cultural Resources Program is that all closures or realignments approved by the BRAC Commission affecting NRHP eligible or listed properties in the HIARNG real property inventory should be reviewed as Section 106 undertakings. The exception to this statement is closure of RCs (Armories); the BRAC language very specifically identifies the decision to close an RC as part of the realignment of forces within the HIARNG virtual installation as a state, rather than a federal action and, therefore, not subject to Section 106 review. State or local preservation laws and regulations could still apply to the RC closures, however. The language of the BRAC Commission reads, "The new Armed Forces Reserve Center (AFRC) in xxxx, xx shall have the capability to accommodate the xxNational Guard units from the following xxARNG Readiness Centers: (Readiness Centers listed), IF THE STATE DECIDES TO RELOCATE THOSE NATIONAL GUARD UNITS." Review Appendix Q of the BRAC final report found at <http://www.brac.gov/docs/final/AppendixQ.pdf> to determine if any proposed BRAC action relating to the HIARNG is state or federal.

I.2.4 Section 110 of the National Historic Preservation Act and Executive Order 13287 "Preserve America"

It is the Department of the Army's responsibility to provide the report to the ACHP by 30 September of each year. The data are obtained from the Army IFS and ARNG PRIDE databases. Each state CRM is responsible for updating the PRIDE database and responding to annual AEDB-EQ data calls to provide accurate data for this report. The specific reporting requirements outlined in EO 13287 (which cite Section 110 of the NHPA) include

- a. Accurate information on the state of federally owned historic properties is essential to achieving the goals of this order and to promoting community economic development through local partnerships. Each agency with real property management responsibilities shall prepare an assessment of the current status of its inventory of historic properties required by Section 110(a)(2) of the NHPA (16 U.S.C. 470h-2(a)(2)), the general condition and management needs of

such properties, and the steps underway or planned to meet those management needs. The annual assessment shall also include an evaluation of the suitability of the agency's types of historic properties to contribute to community economic development initiatives, including heritage tourism, taking into account agency mission needs, public access considerations, and the long-term preservation of the historic properties.

- b. Each agency with real property management responsibilities shall review its regulations, management policies, and operating procedures for compliance with Sections 110 and 111 of the NHPA (16 U.S.C. 470h-2 & 470h-3) and make the results of its review available to the ACHP and the Secretary of the Interior. If the agency determines that its regulations, management policies, and operating procedures are not in compliance with those authorities, the agency shall make amendments or revisions to bring them into compliance.
- c. Each agency with real property management responsibilities shall, by 30 September 2005, and every third year thereafter, prepare a report on its progress in identifying, protecting, and using historic properties in its ownership and make the report available to the ACHP and the Secretary of the Interior. The ACHP shall incorporate these data into a report on the state of the federal government's historic properties and their contribution to local economic development and submit this report to the President by 15 February 2006, and every third year thereafter.
- d. Agencies may use existing information-gathering and reporting systems to fulfill the assessment and reporting requirements of subsections 3(a)-(c) of this order.
- e. The head of each agency shall designate a senior policy level official to have policy oversight responsibility for the agency's historic preservation program and notify the ACHP and the Secretary of the Interior of the designation. This senior official shall be an assistant secretary, deputy assistant secretary, or the equivalent, as appropriate to the agency organization. This official, or a subordinate employee reporting directly to the official, shall serve as the ACHP federal preservation officer in accordance with Section 110(c) of the NHPA. The senior official shall ensure that the federal preservation officer is qualified consistent with guidelines established by the Secretary of the Interior for that position and has access to adequate expertise and support to carry out the duties of the position.

Note – Policy limits NRHP nominations only to those properties the Army plans to develop for public use or transfer out of federal management through privatization efforts. Other nominations will be considered only when justified by exceptional circumstances.

I.3 Regulatory Requirements for Tribal Consultation

I.3.1 National Environmental Policy Act

The purposes of tribal consultation under NEPA are to identify potential conflicts that would not otherwise be known to the HIARNG, and to seek alternatives that would resolve the conflicts. It should be clear to all that NEPA's charge to "preserve important historic, cultural, and natural aspects of our national heritage" cannot be fully met without informed consideration of American Indian heritage.

An administratively key purpose is to develop documentary records sufficient to demonstrate that the HIARNG has taken adequate steps to identify, consult with, and weigh the interests of NHOs in its decision making. **Figure I-2** provides a flowchart summarizing Native American consultation in support of NEPA.

An infringement of religious freedom, or a burden on religious practice, or a loss of religiously significant resources cannot be “mitigated” in the usual sense of the word (i.e., to lessen, soften, lighten). It is possible, however, to deal with potential infringement, burden, or loss by developing alternatives or management options that would avoid the specific impact. Avoiding an impact by not taking a certain action or parts of an action fits within the meaning of mitigation as defined in NEPA.

I.3.2 National Historic Preservation Act

The NHPA requires the identification and consideration of potential adverse effects on properties that might be significant due to their traditional or historic importance to an NHO. The specific requirement for consultation relative to Section 106 of the NHPA is in Section 101(d)(6), added by amendments passed in 1992. **Figure I-3** provides a flowchart of how consultation with NHOs is integrated into the Section 106 review process.

Consultation for Section 106 purposes is limited to NHOs. It focuses (1) on identifying properties with tribal religious or cultural significance that are potentially eligible for inclusion in the NRHP, and (2) on taking into account the effects a proposed federal undertaking might have on them.

The 1992 NHPA amendments add significant new provisions concerning American Indian tribal participation in historic preservation. Regarding consultation, besides Section 101(d)(6) discussed above, Section 110(a)(2) directs federal agencies’ programs to ensure

“(D) that the agency’s preservation-related activities are carried out in consultation with other Federal, State, and local agencies, Indian tribes, [and others] carrying out historic preservation planning activities. . . and . . .

“(E) that the agency’s procedures for compliance with Section 106—

“(ii) provide a process for the identification and evaluation of historic properties . . . and the development and implementation of agreements, in consultation with State Historic Preservation Officers, local governments, [and] Indian tribes . . . regarding the means by which adverse effects . . . will be considered”

The language in Section 101(d)(6), requiring agencies to consult with NHOs that attach religious and cultural significance to traditional properties that may be eligible for the NRHP, reinforces procedures.

Under Section 101(d)(6)(B) and Section 110(E)(ii), consultation may be called for when data recovery is being considered to mitigate adverse effects on a property’s scientific importance, if the property also has ascribed religious and cultural significance.

Where appropriate, such consultation opportunities may be used to meet the separate consultation requirements of 43 CFR 7.7 and Section 3(c) of NAGPRA, as well as those of Sections 101 and 110 of the NHPA.

I.3.3 Archaeological Resources Protection Act

ARPA, Section 4(c), requires notification of the appropriate NHOs before approving a cultural resource use permit for the excavation (testing and data recovery) of archaeological resources (more than 100 years old), if the responsible CRM determines that a location having cultural or religious importance to

the Tribe could be harmed or destroyed. **Figure I-4** outlines the permitting process and consultation requirements for emergency excavations under ARPA.

The uniform regulations implementing ARPA include a provision that the HIARNG may also give notice to any other American Indian group known to consider potentially affected locations as being of religious or cultural importance (43 CFR 7.7(a)(2)).

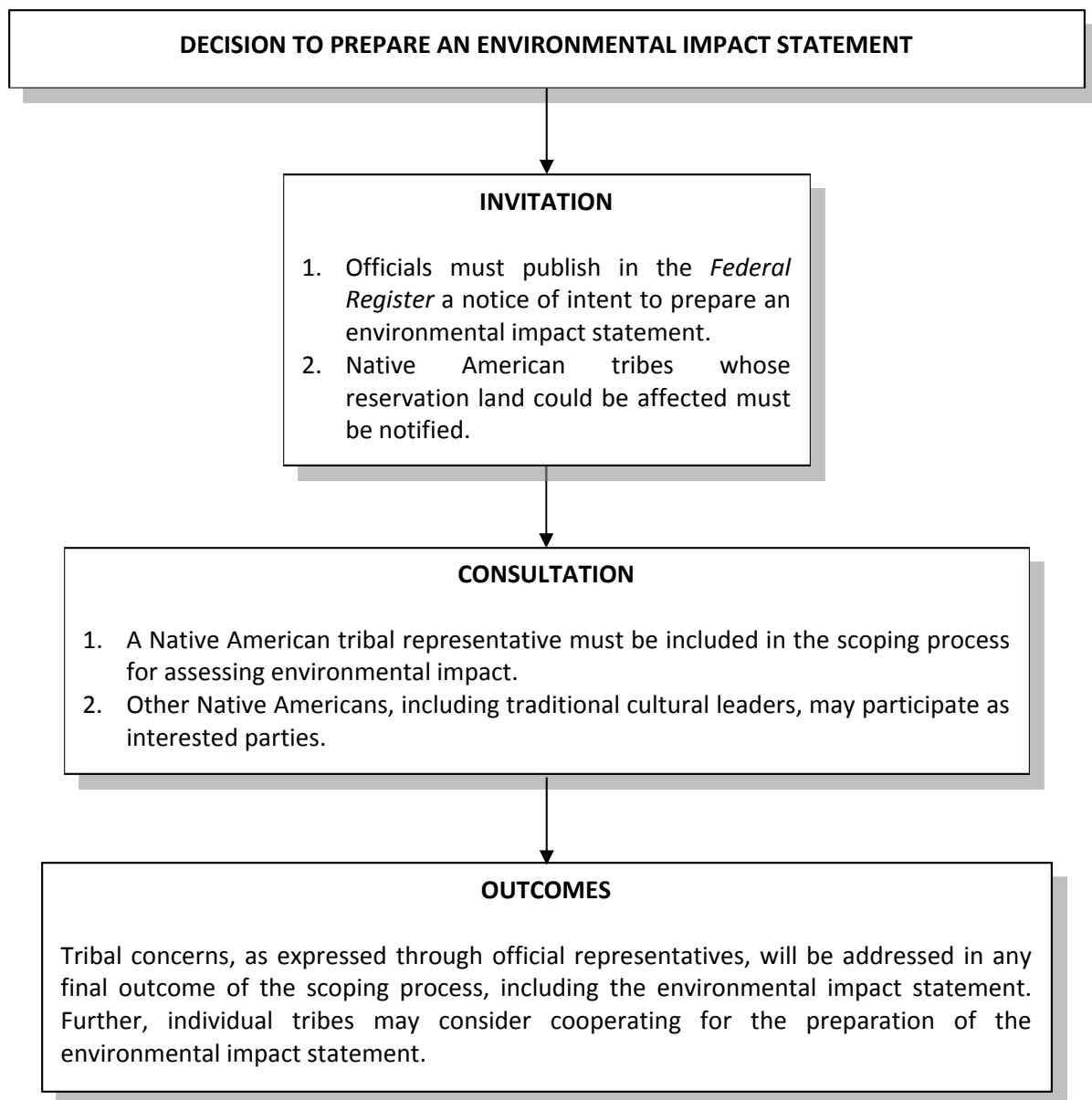
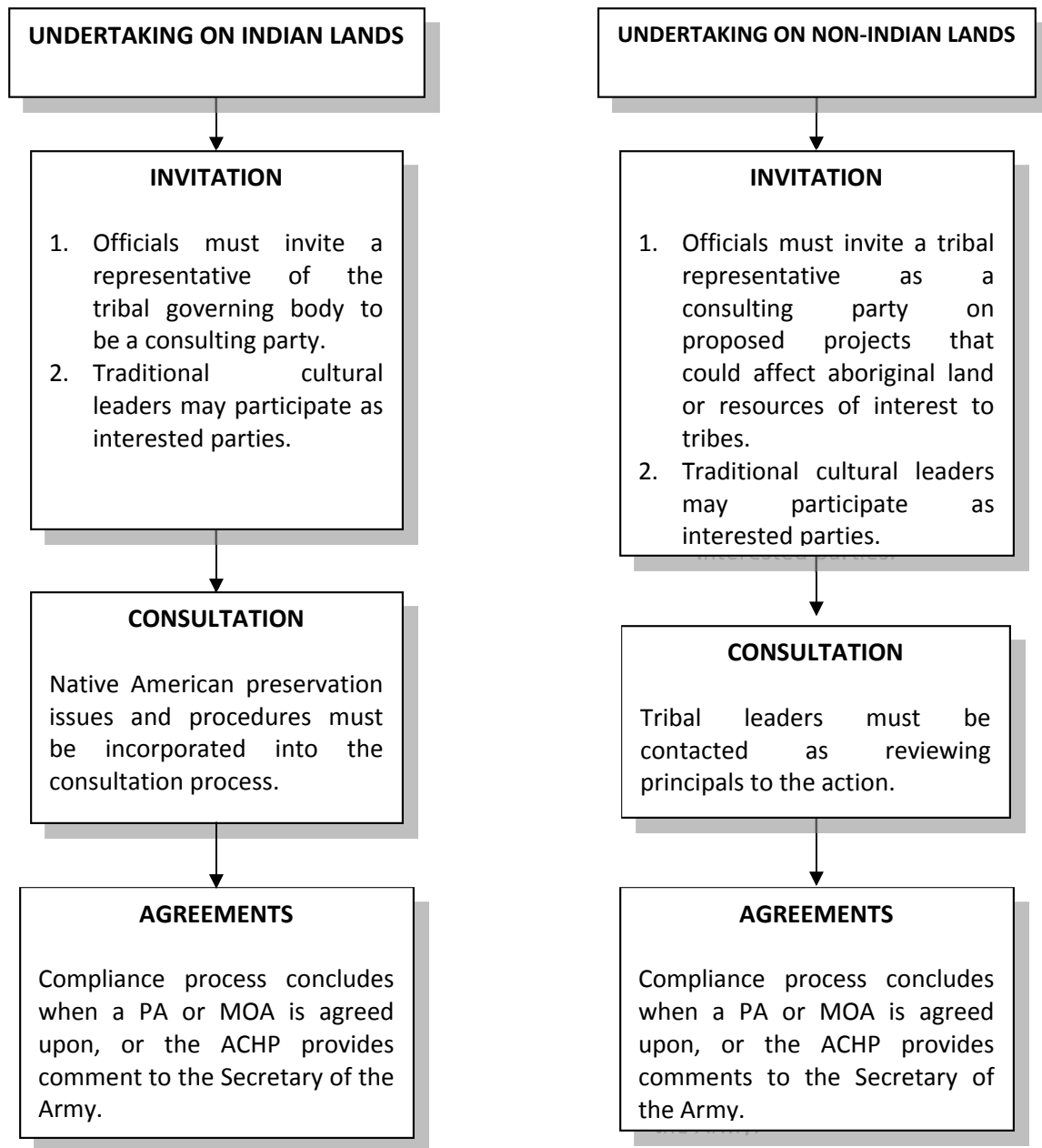


Figure I-2. Native American Consultation in Support of the National Environmental Policy Act.



**Figure I-3. National Historic Preservation Act Section 106 Compliance
(16 U.S.C. 470(f)) Consultation.**

I.3.4 Native American Graves Protection and Repatriation Act

The purpose of consultation under NAGPRA is to reach agreement as to the treatment and disposition of the specific kinds of “cultural items” defined in the act: Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony.

The HIARNG is required to consult with the appropriate federally recognized tribe, Native Hawaiian organization, or lineal descendant under four circumstances:

- A summary of HIARNG holdings, dating from before the act, indicates that unassociated funerary objects, sacred objects, or objects of cultural patrimony are present
- An inventory of HIARNG holdings, dating from before the act, finds human remains or associated funerary objects
- The HIARNG is processing an application for a permit that would allow the excavation and removal of human remains and associated funerary objects from federal lands
- Items covered by the act have been disturbed unintentionally.

Only the last two of these circumstances are discussed here.

NAGPRA: This act established consultation protocols with NatHOs regarding sensitive issues such as the excavation or removal of human burials, and the ownership of sacred objects or objects of cultural patrimony. The act also provides for burial protection and requires that all Federal agencies conduct an inventory of these items that have been previously excavated on lands owned and/or controlled by that agency. Coordination with Native Hawaiians and NHOs is necessary for:

- The proper treatment and disposition of Native Hawaiian remains discovered on HIARNG facilities, inadvertently and/or as a result of archaeological excavations, at any time in the past, including existing collections;
- The identification of any cultural resources of traditional cultural significance; and,
- The interpretation of Native Hawaiian culture and prehistory for the benefit of visitors to the installation.

Three organizations that address and have experience in Native Hawaiian Affairs are: the Office of Hawaiian Affairs (OHA), the Oahu Burial Council, and Hui Malama I Na Kupuna ‘O Hawai‘i Nei. OHA was established by the constitution of the State of Hawaii in 1978. The volunteer Oahu Burial Council is the island designate of the Hawaii Burial Council, housed within the State Historic Preservation Division. Hui Malama I Na Kupuna ‘O Hawai‘i Nei is a nonprofit NHOs incorporated in 1989 to provide guidance and expertise in cultural issues, especially those pertaining to human remains. NAGPRA defines what an NHO is, and the HIARNG will consult with groups that fit that legal description as well as with Native Hawaiians who have knowledge, expertise, or a cultural or familial association with a given area which falls under the HIARNG’s responsibility. In case any human remains or associated items of cultural patrimony are inadvertently discovered on HIARNG managed lands, the HIARNG will cease field operations and follow the guidelines set forth in SOP #6.

Intentional Removal

Under NAGPRA, the HIARNG must consult with appropriate NHOs, or individuals prior to authorizing the intentional removal of Native Hawaiian human remains and funerary objects found with them.

Documentation to show that consultation pursuant to Section 3(c) of NAGPRA has occurred must be included and maintained in the decision record.

A cultural resource use permit or equivalent documentation is generally required before human remains and artifacts covered by the act may be excavated or removed from federal lands. Permit-related notification and consultation, if it is requested, are required by ARPA Section 4 and 43 CFR 7.7.

When permit-related consultation will be taking place, it should be appropriate in most cases to use that opportunity to consult prospectively with respect to NAGPRA, to develop procedures to be followed in case human remains and cultural items are discovered. In any event, consultation for NAGPRA purposes must occur before the excavation or removal of human remains and cultural items may be authorized.

Unintended Disturbance

Human remains or cultural items subject to NAGPRA discovered as a result of an ARNG or ARNG-authorized activity, such as construction or other land-disturbing actions, are to be handled in the manner described in the “inadvertent discovery” procedures found at Section 3(d) of NAGPRA.

Where there is a reasonable likelihood of encountering undetected cultural items during a proposed land use, agreements should be negotiated with NHOs or groups before the project is authorized to provide general guidance on treatment of any cultural items that might be exposed. Having these agreements in place saves time and confusion during the action (see **Appendix J**). In particular, the HIARNG should make provisions repatriation of human remains and funerary objects to the appropriate NHOs or living descendants, if they can be identified.

I.3.5 American Indian Religious Freedom Act

The primary purpose of AIRFA was to establish a policy of federal protection for traditional American Indian religious freedoms. Therefore, consultation for purposes of AIRFA is specifically directed at identifying the concerns of traditional American Indian religious practitioners relative to proposed HIARNG actions.

Traditional religious practitioners are frequently not tribal officials or governmental leaders.

Consultation pursuant to AIRFA should be initiated as soon as land uses are proposed that have the potential to affect American Indian religious practices.

The CRM must make reasonable efforts to elicit information and views directly from the American Indians whose interests would be affected. All potentially interested NHOs and groups should be contacted by letter and telephone to request their direct participation and input. This would include NHOs and groups that live near or use the lands in question, and also those known to have historical ties to the lands but now live elsewhere.

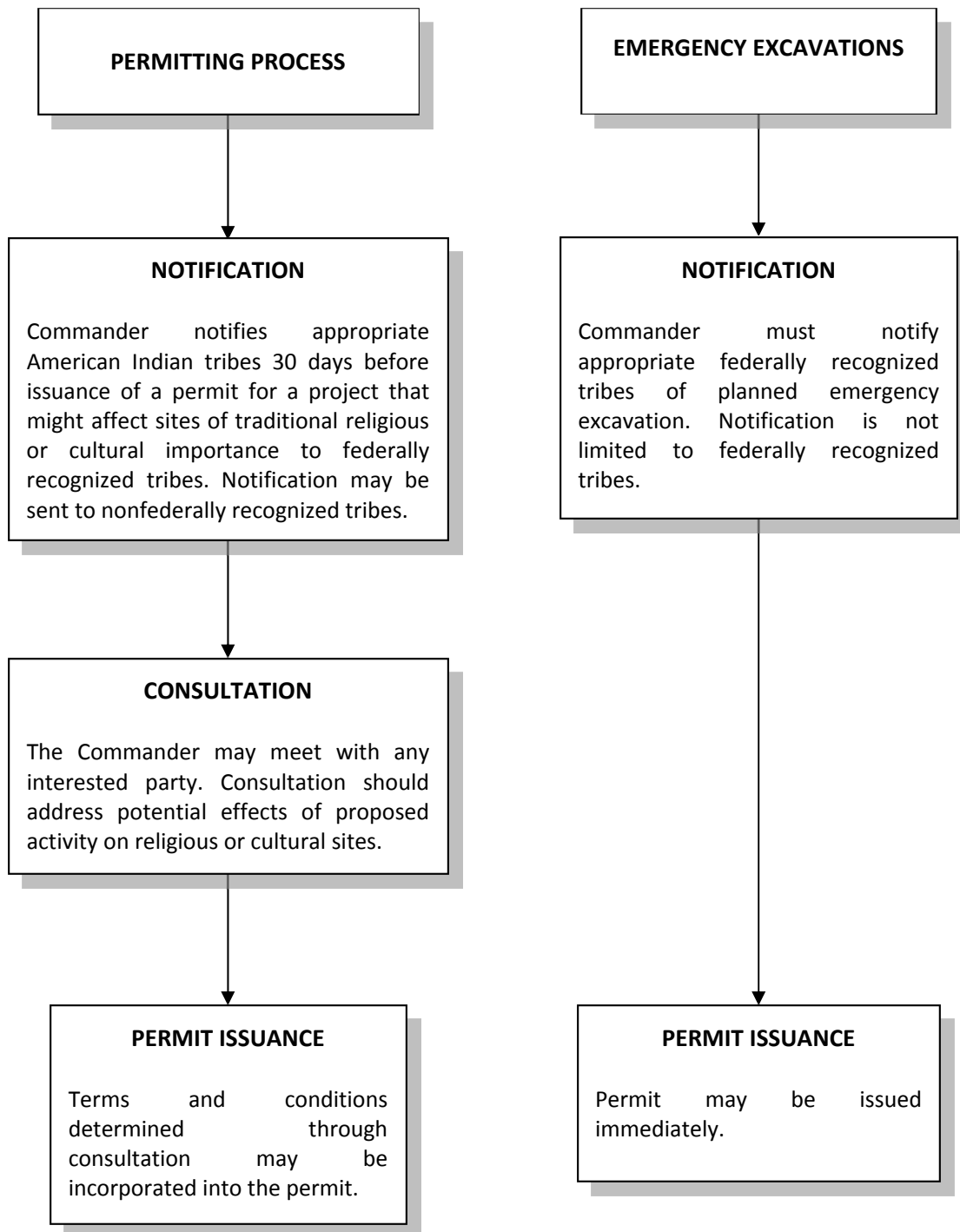


Figure I-4. Archaeological Resources Protection Act.

In any such communication, it must be clear that the purpose of the request is to learn about places of traditional religious importance that cannot be identified without the Tribe's or group's direct assistance, so that the HIARNG can know to protect the places from unintended harm and to provide for appropriate American Indian access.

Following initial mail or telephone contact, if there is reason to expect that places of religious significance to the federally recognized tribe or Native Hawaiian organization are likely to be affected by HIARNG actions, the district manager or an authorized representative should initiate face-to-face personal contact with appropriate officials of the Tribe or group or with traditional religious leaders.

The purpose of such personal contact is to seek mutually acceptable ways to avoid or minimize disturbance of traditional religious places or disruption of traditional religious practices.

Specific requests to obtain and consider information during planning or decisionmaking must be thoroughly documented, both as part of the administrative record and as a basis for determining if further inventory or consultation will be needed in subsequent HIARNG actions.

AIRFA: This ICRMP will implement procedures to protect the right of Native Hawaiians to exercise their traditional religion and have access to sacred sites to worship through ceremonies and traditional rites. These procedures will be established through the consultation process with NHOs, the Island Burial Councils, OHA, and others pertinent to the religious activity. Future consultation will identify sacred sites required by Native Hawaiians to exercise traditional religious ceremonies, and the installation shall provide access as needed within reasonable terms, conditions, and restrictions for such access for the protection of personnel, for safety, to avoid interference with the military mission, or for reasons of national security. The location of sacred sites will remain confidential. Impacts to these sites will be avoided and management procedures developed to ensure reasonable notice is provided to Native Hawaiians when proposed training or other actions will restrict access to these sites as set forth in an SOP in the ICRMP. If a sacred site meets the significance requirements for eligibility for listing on the NRHP under the NHPA, other compliance requirements under Section 106 consultation and the development of a mitigation plan will be undertaken.

The HIARNG has three Native Hawaiian prehistoric sites at the Keaukaha Military Reservation (KMR) facility. The Regional Training Institute (RTI) site on Oahu has a single, deeply buried prehistoric site. At KMR, one site is a collection of five ahu or rock cairns; one is a planting feature; and the third is a modified lava outcrop also interpreted as a planting feature. No other facilities have prehistoric Native Hawaiian sites. None of the aforementioned sites are considered TCPs.

I.3.6 DoDI 4710.03 – DoD Consultation with Native Hawaiian Organizations

- This instruction establishes policy and addresses the policies and interactions that govern consultation between NHOs and DoD, establishes a framework for consultation and provides the DoD components in Hawaii with a framework to develop localized processes to facilitate consultation.

I.3.7 Presidential Memorandum for Heads of Executive Departments and Agencies Dated April 29, 1994: Government-to-Government Relations with Native American Tribal Governments.

This memorandum requires consultation between the HIARNG and NHOs on a government to government basis in an open and candid manner, formally and directly between the installation commander and the representative of the NHOs. This is achieved through formal written letters designating a *Coordinator for Native Hawaiian Affairs* who is authorized to continue consultation with the representative of the Native Hawaiian group or organization. Any decisions resulting from formal consultation will be formally transmitted to the Native Hawaiian group or organization by the installation commander. The HIARNG does not have a *Coordinator for Native Hawaiian Affairs*, however, the *Cultural Resources Manager (CRM)* and the *Environmental Protection Manager (EPM)* have been designated as the representatives of the installation commander to installation commanders consultation representatives in both Section 106 consultation under 36 CFR 800 and in this Presidential Memorandum.

While this Presidential Memorandum is not specifically applicable to Native Hawaiians, the history of Native Hawaiian interactions with, and treatment by, the U.S. government, warrants that Native Hawaiians, through appropriate agencies such as the State of Hawaii's Office of Hawaiian Affairs (OHA), be afforded essentially the same government-to-government treatment and respect as federally recognized Indian tribes.

Since these statutes and rules do not uniformly apply to historic properties found on Federal lands or lands under Federal control, they are not included in their entirety in this document. However, given that the Hawaii Revised Statutes (HRS) governing the treatment and disposition of Native Hawaiian human remains are germane to NAGPRA compliance and Native Hawaiian consultation, the relevant portion of HRS is reproduced below. For more information, the HRS and HAR can be consulted on-line at <http://dlnr.hawaii.gov/shpd/rules/>

I.4 Regulatory Requirements for Consultation with SHPD, NHOs, and Burial Councils

Since Chapter 6E and other relevant State statutes and rules do not uniformly apply to historic properties found on Federal lands or lands under Federal control, the specific rules r. However, given that the Hawaii Revised Statutes (HRS) governing the treatment and disposition of Native Hawaiian human remains are germane to NAGPRA compliance and Native Hawaiian consultation, the relevant portion of HRS is reproduced below. For more information, the HRS and HAR can be consulted on-line at <http://dlnr.hawaii.gov/shpd/rules/>.

I.4.1 Prehistoric and Historic Burial Sites (Section 43)

- (a) *At any site, other than a known, maintained, actively used cemetery where human skeletal remains are discovered or are known to be buried and appear to be over 50 years old, the remains and their associated burial goods shall not be moved without the department's approval.*
- (b) *All burial sites are significant and shall be preserved in place until compliance with this section is met, except as provided in section 6E-43.6. The appropriate island*

burial council shall determine whether preservation in place or relocation of previously identified Native Hawaiian burial sites is warranted, following criteria which shall include recognition that burial sites of high preservation value, such as areas with a concentration of skeletal remains, or prehistoric or historic burials associated with important individuals and events, or areas that are within a context of historic properties, or have known lineal descendants, shall receive greater consideration for preservation in place. The criteria shall be developed by the department in consultation with the councils, Office of Hawaiian Affairs (OHA), representatives of development and large property owner interests, and appropriate Hawaiian organizations, such as Hui Malama I Na Kupuna O Hawai'i Nei, through rules adopted pursuant to chapter 91. A council's determination shall be rendered within forty-five days of referral by the department unless otherwise extended by agreement between the landowner and the department.

- (c) Council determinations may be administratively appealed to a panel composed of three council chairpersons and three members from the Board of Land and Natural Resources as a contested case pursuant to Chapter 91. In addition to the six members, the chairperson of the board of land and natural resources shall preside over the contested case and vote only in the event of a tie.*
- (d) Within ninety days following the final determination, a preservation or mitigation plan shall be approved by the department in consultation with any lineal descendants, the respective council, other appropriate Hawaiian organizations, and any affected property owner.*
- (e) Should the burial site prove to be other than Hawaiian, the department, within thirty days shall determine whether preservation in place or relocation is warranted, and within an additional ninety days a preservation or mitigation plan shall be approved by the department in consultation with any lineal descendants, appropriate ethnic organizations, and any affected property owner. [L 1988, c 265, pt of §1; am L 1990, c 306, §13; am L 1992, c 113, §4]*

http://www.hawaii.edu/ohelo/statutes/HRS006E/HRS_0006E-0043.htm

I.4.1 Inadvertent Discovery of Burial Sites (Section 43.6)

- (a) In the event human skeletal remains are inadvertently discovered, any activity in the immediate area that could damage the remains or the potential historic site shall cease until the requirements of subsections (b) to (d) have been met.*
- (b) The discovery shall be reported as soon as possible to the department, the appropriate medical examiner or coroner, and the appropriate police department. As soon as practicable, the department shall notify the appropriate council and the Office of Hawaiian Affairs (OHA).*
- (c) After notification of the discovery of multiple skeletons, the following shall be done within two working days, if on Oahu, and three working days, if in other council jurisdictions:*
 - *A representative of the medical examiner or coroner's office and a qualified archaeologist shall examine the remains to determine jurisdiction. If the remains are the responsibility of the medical examiner or coroner, the department's involvement shall end. If the remains are historic or prehistoric burials, then the remainder of this section shall apply;*

- *The department shall gather sufficient information, including oral tradition, to document the nature of the burial context and determine appropriate treatment of the remains. Members of the appropriate council shall be allowed to oversee the on-site examination and, if warranted, removal; and*
 - *If removal of the remains is warranted, based on criteria developed by the department, in consultation with the councils, OHA, representatives of development and large property owner interests, and appropriate Hawaiian organizations, such as Hui Malama I Na Kupuna O Hawai'i Nei, through rules adopted pursuant to chapter 91, the removal of the remains shall be overseen by a qualified archaeologist and a mitigation plan shall be prepared by the department or with the concurrence of the department.*
- (d) *In cases involving the discovery of a single skeleton, the requirements of subsection (c) shall be fulfilled in one working day if on Oahu, and two working days if in other council jurisdictions.*
- (e) *The mitigation plan developed by or with the concurrence of the department pursuant to subsection (c) (3) shall be carried out in accordance with the following:*
- *In discoveries related to development where land alteration project activities exist, the landowner, permittee, or developer shall be responsible for the execution of the mitigation plan including relocation of remains. Justifiable delays resulting from the discovery of burials shall not count against any contractor's completion date agreement;*
 - *Project activities shall resume once necessary archaeological excavations provided in the mitigation plan have been completed;*
 - *In non-project contexts, the department shall be responsible for the execution of the mitigation plan and the relocation of remains; and*
 - *The department shall verify the successful execution of the mitigation plan.*

In cases where remains are archaeologically removed, the department shall determine the place of relocation, after consultation with the appropriate council, affected property owners, representatives of the relevant ethnic group, and any identified lineal descendants, as appropriate. Relocation shall conform with requirements imposed by the department of health, and may be accompanied by traditional ceremonies, as determined by the lineal descendants, or, if no lineal descendants are identified, the appropriate council or representatives of the relevant ethnic group that the department deems appropriate. Specific or special reinterment requests from lineal or cultural descendants may be accommodated provided that the affected descendants pay the additional expenses incurred. [L 1990, c 306, pt of §3]

http://www.hawaii.edu/ohelo/statutes/HRS006E/HRS_0006E-0043_0006.htm

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National Historic Preservation Act Has Moved!

As you may have heard, the National Historic Preservation Act (NHPA) has a new home in the United States Code (U.S. Code), the official compilation of federal statutes. While the NHPA was previously codified at title 16 of the U.S. Code, effective December 19, 2014, it was moved to title 54. Please find the law codifying the NHPA in title 54 [here](#). The provisions of the newly codified NHPA may be found starting at section 300101.

This recodification was carried out as part of a larger effort to better organize all the statutes related to the National Park Service, which plays a key role in the NHPA due to its duties connected to the National Register of Historic Places and the State and Tribal Historic Preservation Offices, among others. The recodification also resulted in the removal of obsolete provisions, changes to the location of some sections and subsections so they are better grouped thematically, and the correction of technical errors. However, none of the changes are substantive. The requirements and programs under the NHPA remain the same. They are simply better organized and located in a new title of the U.S. Code.

In the coming weeks, you will notice that the Advisory Council on Historic Preservation (ACHP)’s new official documents and Web site entries will start using the new U.S. Code citations for the NHPA. The ACHP expects stakeholders to transition to usage of the new U.S. Code citations to the NHPA as soon as they are reasonably able. However, please note that the law that moved the NHPA to title 54 specifies that a reference to an old title 16 provision (e.g., 16 U.S.C. 470f, for Section 106 of the NHPA) is legally deemed to refer to the corresponding provision in the new title 54. So, you do not need to be concerned if it takes some time to make such citation changes in future NHPA correspondence with the ACHP or within Section 106 agreement documents. No amendments to past NHPA correspondence or existing Section 106 agreements will be needed or expected.

The regulations implementing Section 106 of the NHPA, at 36 CFR part 800, are not affected by this recodification, so you can continue referencing those regulations as you have before.

The ACHP intends to continue referring to Section 106 of the NHPA as “Section 106” since that refers to the section in the original public law that enacted the NHPA, as opposed to its legal citation on the U.S. Code. It is also a reference that has been in constant use for almost 50 years.

Finally, for your convenience, here are some of the more frequently used, old citations to the NHPA and their corresponding citations in the new title 54:

Name	Old NHPA (title 16)	New NHPA (new title 54)
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NHPA in general	16 U.S.C. 470 et seq.	54 U.S.C. 300101 et seq.
Section 106	16 U.S.C. 470f	54 U.S.C. 306108
Section 110(a)	16 U.S.C. 470h-2(a)	54 U.S.C. 306101(a) and 306102
Section 110(f)	16 U.S.C. 470h-2(f)	54 U.S.C. 306107
Section 110(k)	16 U.S.C. 470h-2(k)	54 U.S.C. 306113
Section 110(l)	16 U.S.C. 470h-2(l)	54 U.S.C. 306114
Section 111	16 U.S.C. 470h-3	54 U.S.C. 306121 and 306122

If you have any questions, please contact Javier Marques, Associate General Counsel, at jmarques@achp.gov.

Updated on January 7, 2015

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NATIONWIDE PROGRAMMATIC AGREEMENT
for
ARMY NATIONAL GUARD READINESS CENTERS MAINTENANCE AND REPAIR
among
The NATIONAL GUARD BUREAU
The NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS
and
The ADVISORY COUNCIL ON HISTORIC PRESERVATION

WHEREAS, the National Guard Bureau (NGB) must comply with Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470f) and its implementing regulations, 36 CFR Part 800, for all Federally owned or Federally supported Army National Guard (ARNG) Readiness Centers (Readiness Centers), also known as "armories," in all fifty States, Puerto Rico, the U.S. Virgin Islands, Guam, and the District of Columbia, ("States"); and

WHEREAS, for this Programmatic Agreement (PA), "Readiness Centers" includes all structures attached to the main Readiness Center building and separate structures located within the "Area of Potential Effect" for the relevant undertakings, and some of these ARNG Readiness Centers are historic properties (as defined at 36 CFR §800.16(l)(1)) and others may be historic properties but the eligibility determination has not occurred; and,

WHEREAS, this PA, addresses solely routine maintenance and repair of Readiness Centers that are "undertakings" (as defined in 36 CFR § 800.16(y)) which could affect historic properties, subject to Section 106 review; and,

WHEREAS, for the purposes of this Programmatic Agreement, routine maintenance is defined as regular and general upkeep of a readiness center against normal wear and tear; and,



WHEREAS, pursuant to AR 200-1, 13 December 2007, *Environmental Protection and Enhancement*, Subsection 1-15, (or any succeeding document), the NGB is defined as an "installation management organization" for the state ARNGs and, per Terms, Section II, each Adjutant General (TAG) is defined as the "Installation Commander" for each of the States, Territories, and DC; and,

WHEREAS, the NGB has jurisdiction over federally owned and state owned and operated facilities, including Readiness Centers, due to their receiving federal funding; and,

WHEREAS, this PA, prepared pursuant to 36 CFR §800.14(b)(2), addresses the effects of any ARNG routine maintenance and repair undertakings at Readiness Centers, and which may include the following determinations: No Historic Properties Affected (36 CFR 800.4(d)(1)), No Adverse Effect (36 CFR 800.5 (b), (c)), and Adverse Effect (36 CFR 800.5 (a)(1) (2)), and establishes a program alternative by which NGB will ensure compliance with Section 106; and,

WHEREAS, the NGB, in consultation with the U.S. Army Federal Preservation Officer (FPO), Army Environmental Command (AEC), and the ACHP determined that consultation with Native American tribes during the development of this PA was not necessary because this PA deals specifically with renovations to above ground resources and any undertakings that require ground disturbance outside of the scope of this PA require additional tribal consultation in accordance with 36 CFR 800.2(c)(ii); and,

WHEREAS, the NGB afforded the public an opportunity to comment on this PA by contacting a state-wide non-profit historic preservation organization where applicable and academic experts to obtain comments and provided access to the draft Programmatic Agreement on a project website where interested parties could provide comment; and (Appendix D),

WHEREAS, the NGB has completed *The Historic Context for Army National Guard Readiness Centers* in June 2008 to assist the NGB with applying National Register of Historic Places (NRHP) eligibility criteria contained in 36 CFR § 60.4, to its Readiness Centers and to serve as an overview of



the different types of architecture, architects, social history, people and events that occurred throughout the United States related to Readiness Centers (Appendix A); and,

WHEREAS, the NGB has consulted with the ACHP, the National Conference of State Historic Preservation Officers (NCSHPO), the National Trust for Historic Preservation (National Trust), the United States Department of Interior's National Park Service (NPS), cultural resources experts in academia, and has requested the ACHP, NGB, and NCSHPO to sign this PA in accordance with 36 CFR § 800.14(b)(2)(iii) and Appendix D.

NOW THEREFORE, the NGB, the ACHP and NCSHPO agree that this PA will address NGB's Section 106 compliance responsibilities for maintenance and repair at historic ARNG Readiness Centers.

STIPULATIONS

The NGB shall implement the following measures:

I. Terms of the Programmatic Agreement

A. Every state ARNG organization will be required to organize a consultation meeting with the appropriate SHPO within 90 days of the signing of this agreement. During that meeting, a state ARNG representative (the Cultural Resources Manager (CRM) or the Environmental Program Manager (EPM)) and the SHPO will determine whether to implement the alternative process outlined in this PA to meet their Section 106 responsibilities. Within 120 days of the signing of this agreement, the state ARNG EPM will formally notify the NGB in writing of the decision made during this consultation. Within 150 days following the signing of this agreement, the NGB will notify, via formal correspondence, the NCSHPO and the ACHP which state ARNGs and SHPOs will fulfill their Section 106 responsibilities in accordance with the alternative process outlined in this PA. If, during the aforementioned consultation meeting, it is determined that a state ARNG will not use the alternative



process outlined herein, the state ARNG and SHPO will continue to meet the Section 106 consultation requirements in accordance with Subpart B of 36 CFR Part 800.

- i. State ARNGs and SHPOs that initially chose not to use the alternative procedures described herein may, in the future, reconsider this approach and implement the PA in their respective states. After reconsideration, and the state ARNG and SHPO make a preliminary determination to use the PA, they should follow the steps set forth in I. A. above to complete the process and notify the NGB as appropriate.

B. A Cultural Resources Manager (CRM) in the state, who will act as a liaison on behalf of the installation's TAG, will perform daily installation cultural resources management responsibilities and will coordinate with all internal and external stakeholders.

C. The installation's commander will ensure that the CRM has appropriate knowledge, skills, and professional training and education to carry out installation cultural resources management responsibilities. The installation commander will also ensure that all cultural resources technical work (including but not limited to identification, evaluation, and treatment of historic properties, and preparation and implementation of an Integrated Cultural Resources Management Plan (ICRMP)), is conducted by individuals who meet the applicable professional qualifications standards established by the National Park Service in 36 CFR 61, Appendix B.

D. The terms of the PA apply to NGB undertakings concerning the maintenance and repair Readiness Centers. The list of current ARNG Readiness Center properties is set forth in Appendix B attached hereto.

E. This PA does not address ARNG undertakings that could cause ground disturbance or that may affect archaeological sites, except those areas previously designated as easements (e.g., natural gas, telephone, and water lines) or areas where disturbance has already occurred (e.g., sidewalks, driveways, paths) for the first six inches depth of ground disturbance. For excavation work deeper



than six inches on Readiness Center properties, the standard 36 CFR Part 800 consultation process must be followed.

F. This PA does not apply on "tribal lands" as defined under 36 CFR § 800.16(x).

G. This PA does not apply to replacement or repair of wall insulation. Any action to this insulation will require compliance with the standard 36 CFR 800 consultation process.

II. Exemptions

The CRM will determine whether a proposed activity meets the definition of one of the exempted activities listed below. If the CRM determines the proposed activity meets one or more of the definitions listed below, the proposed activity is then exempt from further Section 106 review. For each instance in which the installation CRM employs any of these exemptions, the CRM shall prepare written documentation to be retained in the CRM's records and used in the annual report. The CRM will specifically identify which of the exempt category(ies) was utilized.

Exterior and interior work is exempted from Section 106 review when it:

- i. Affects those materials listed under Exemption II.A and II.B below;
- ii. Is routine maintenance, defined as regular and general upkeep of a readiness center against normal wear and tear;
- iii. Involves repair or replacement with in-kind materials when the material being repaired or replaced has been identified as contributing to the historic significance of the building; and,
- iv. Non-historic/non-character defining exemptions will apply to both exterior and interior maintenance and repair of non-historic or non-character defining materials only when historic or character defining features or materials are not destroyed, obscured, concealed, or altered or otherwise compromised. These exemptions only apply to Readiness Centers when a



formal study by qualified professionals have evaluated and identified those elements that are historic or character defining and those that are non-historic or non-character defining materials and that the appropriate SHPO has concurred with those findings.

- v. Meets the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, and Reconstructing Historic Buildings* (Weeks, Kay. D and Grimmer, Anne E, 1995, http://www.nps.gov/history/hps/tps/standards/standards_complete.pdf) when repair or replacement will occur to those materials identified as contributing to the historic significance of the building.

A. Exterior Exemptions Apply to:

1. Painting on previously painted surfaces using similar color
2. Paint removal by means that will not damage or adversely affect the historic fabric of the building
3. Repair of existing walkways
4. Repair of existing parking areas within the existing footprint and not involving lighting and landscaping changes
5. Repair of existing above ground fuel storage facilities
6. Placement of temporary, or not permanently fixed, barriers for compliance with DoD Minimum Antiterrorism Standards for Buildings (UFC 4-010-01 8 October 2003)
7. Building exterior repairs that matches existing details, form, and materials and meet the requirements as specified above in II i-iv
8. Building exterior replacement that matches existing details, form, and materials, meets the requirements as specified above in II 1-iv, and only when deterioration of the material is beyond repair

B. Interior Exemptions Apply to:



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1. Insulation (ceilings, attics, basement spaces, plumbing pipes, hot water heaters, and ductwork)
2. Electrical systems
3. Telecommunications equipment
4. Security systems
5. Fire suppression systems
6. Non-destructive asbestos removal and abatement
7. Non-destructive lead paint abatement

III. Section 106 Review Process for Readiness Center Undertakings

CRMs shall carry out the following process for each undertaking under the scope of this PA:

A. Identification and Evaluation of Readiness Centers

1. CRMs shall consult Appendix B and the PRIDE (Planning Resource Infrastructure Development and Evaluation (PRIDE) is the ARNG's real property database) to determine the historic property status for the relevant ARNG Readiness Center. If an installation has not been evaluated an ARNG Readiness Center for NRHP eligibility, the Readiness Center's eligibility will be determined per 36 CFR 800.4.
2.
 - a. If the relevant Readiness Center is a "historic property," or eligible for or listed on the NRHP, then the installation will proceed to Stipulation III B.
 - b. If the relevant Readiness Center is not a historic property, then no further Section 106 review is necessary. The CRM shall document this determination and proceed accordingly.



B. Consultation with Indian Tribes and Native Hawaiian Organizations

1. The CRM will consult with Indian tribes or Native Hawaiian organizations for a proposed Readiness Center project if the CRM, through their regular, yearly consultation efforts, identifies a Federally-recognized Indian tribe or Native Hawaiian organization that may attach religious and cultural significance to a historic property affected by the proposed undertaking or is otherwise interested in a particular Readiness Center. Consultation with Indian tribes or Native Hawaiian organizations regarding the undertaking will take place through formal government to government consultation unless another agreement is in place such as a formal Memorandum of Understanding (MOU) that specifically outlines other consultation protocol. All tribal consultation will begin at the same time that consultation with the SHPO occurs.

C. Determination of Effect on Historic Readiness Centers

If a proposed undertaking does not meet the definition of an exempted activity as defined in Section II, then the CRM will follow the process as stipulated within 1 and 2 below.

1. No Adverse Effect—36 CFR §800.5 (b) and (c)
 - a. If the CRM determines that a proposed undertaking will not adversely affect a Readiness Center that is an historic property because the Secretary of Interior Standards (36 CFR 68) will be followed, the CRM will:
 - (i) Notify the SHPO in writing for each undertaking and include the documentation specified in 36 CFR §800.11(e) and request concurrence with the CRM's finding of no adverse effect.
 - (aa) If SHPO concurs in writing within thirty days of the receipt of the CRM's finding and appropriate documentation, the proposed Readiness Center undertaking will proceed.



(bb) If SHPO does not reply to the CRM within thirty days of receipt of the CRM's request and appropriate documentation in writing, the CRM's no adverse effect finding will become final and the proposed Readiness Center undertaking will proceed without further Section 106 review.

(cc) If the SHPO replies to the CRM's finding within thirty days of receipt of the CRM's finding request and appropriate documentation in writing, but does not concur with the CRM's finding of no adverse effect, the CRM and the SHPO will attempt to resolve the disagreement. When the CRM determines that an agreement on the finding cannot be reached, the CRM shall refer the matter to the NGB and:

(dd) The NGB shall determine whether to revise the CRM's effect finding.

a. If the NGB revises the CRM's finding to meet SHPO's position, the CRM will move on to Stipulation III.C.2.

b. If the NGB decides not to revise the CRM's effect finding, the parties will exercise the Dispute Resolution procedures set forth in Administrative Stipulation V.

2. Adverse Effect— (36 CFR §800.5 (a)(1) and (2).) The following procedure shall serve as a substitute for the process set forth in 36 CFR §800.6, *Resolution of Adverse Effects*, and specifically 36 CFR §800.6 (c), *Memorandum of Agreement*:

a. If the CRM, after considering alternative actions, determines that a proposed project may adversely affect a Readiness Center that is an historic property, the CRM will:

(i) Notify the SHPO in writing of the undertaking, including the information as specified in 36 CFR §800.11(e), the alternatives that were considered to avoid the Adverse Effect and why they were not possible to implement, proposed appropriate mitigation, and to request



the SHPO's concurrence on the finding. Proposed mitigation may involve HABS/HAER Level III documentation as described in Appendix C of this PA, though HABS/HAER Level I and II and/or other mitigation measures may be more acceptable and should be considered on a case by case basis based on the specific undertaking.

(aa) If the SHPO concurs in writing within thirty days of the receipt of the CRM's finding of adverse effect and recommended mitigation, the proposed project will proceed in accordance with the CRM's suggested mitigation measures.

(bb) If the SHPO does not respond in writing to the CRM within thirty days of receipt of the CRM's finding of adverse effect and recommended mitigation, the proposed Readiness Center project will proceed in accordance with the CRM's suggested mitigation measures.

(cc) If the SHPO responds in writing to the CRM within the thirty day time period, but does not agree with the CRM's recommended mitigation measures, the CRM, the NGB, and the SHPO will consult further to attempt to reach an agreement.

(dd) If agreement regarding mitigation measures or any other matter related to the adverse effect determination cannot be reached, the parties will exercise the Dispute Resolution procedures set forth in Administrative Stipulation V.

(ii) Notify the interested public of the undertaking and the adverse effect determination either on the State ARNG's or State SHPO's website(s) or in other means by which the state ARNG feels is an appropriate means of notifying interested parties of the undertaking. The State ARNG will take into account ARNG any comments received by the interested public.

(aa) Notification of the public should occur at the same time that the CRM notifies the SHPO of the CRM's finding of adverse effect and recommended mitigation.



Administrative Stipulations

I. Personnel

The State ARNG's Facilities Management Officer (FMO) or Construction and Facilities Management Officer (CFMO) will include the CRM in their state's planning for proposed projects and activities related to the maintenance and repair of Readiness Centers that are historic properties early in the planning process. After participating in the state-level planning process, the CRM will coordinate with the state SHPO for all non-exempt undertakings.

II. Anti-Deficiency Act Compliance

All requirements set forth in this PA requiring expenditure of U.S. Army funds are expressly subject to the availability of appropriations and the requirements of the Anti-Deficiency Act (31 U.S.C. Section 1341). No obligation undertaken under the terms of the PA shall require or be interpreted to require a commitment to expend funds not appropriated for a particular purpose. Should the requirements of the Anti-Deficiency Act apply, the NGB will consult with the ACHP and NCSHPO, according to the amendment and termination procedures found in Administrative Stipulations VII and VIII.

III. Readiness Center Reporting, Annual Review and Preparation of Annual Report by NGB

1. For those states in which the state ARNG CRMs reviewed an undertaking pursuant to this PA, the NGB will provide a nationwide annual report to the ACHP and the NCSHPO. The NCSHPO will send a copy of the annual report to all SHPOs upon receipt. NGB will provide any other interested parties copies of the annual report upon written request.
 - a. The annual reports will consist of the previous fiscal year's (October 1 – September 30) activities and will be available on or before January 31 of each year.



b. Annual reports will include a list of projects and program activities on Readiness Centers that are historic properties in which this Programmatic Agreement was utilized including those projects that have no adverse effect, those with an adverse effect, and those in which an exemption as listed in Stipulation II was utilized.

c. The NGB reports will summarize consultation, alternatives, mitigation, and treatment measures that were implemented to address the adverse effects and include the number of exemptions per category.

(i). The nationwide summary will include the views of SHPOs and other consulting parties who were involved with the project or activity.

(ii). Determinations of Eligibility on Readiness Centers completed in the previous year will also be summarized in the NGB nationwide annual report.

(iii). NGB will prepare nationwide annual reports for the life of this PA. This annual report will include revisions, if any, to Appendix B. Revisions/amendments to Appendix B will not require amendment to this PA.

IV. Unanticipated Discovery Resulting from Readiness Center Projects Addressed in this PA

A. If, during the Section 106 process at a Readiness Center, a proposed project leads to discovery of other historic properties or has unanticipated effects on historic properties, the CRM shall be contacted immediately by the Superintendent of the Readiness Center. All work within a fifty (50) foot buffer around the discovery shall be suspended by the Superintendent of the Readiness Center. The CRM will immediately notify the NGB of the unanticipated discovery. The work will not resume without the written authorization of the NGB.

B. The CRM shall then proceed in accordance with 36 CFR 800.13(b).



C. The NGB shall only authorize resumption of the Readiness Center project following satisfactory completion of any necessary field investigations.

V. Dispute Resolution

A. Should any individual SHPO, NCSHPO, and/or other signatories to this agreement object in writing to any actions carried out or proposed pursuant to this PA, the NGB will consult with the objecting party and signatories to resolve the objection. If the NGB determines that the objection cannot be resolved, the NGB shall forward all documentation relevant to the dispute to the ACHP, including the NGB's proposed response to the objection. Within 30 days after receipt of all pertinent documentation, the ACHP, after consulting with the objecting party, will either:

1. Advise the NGB in writing that the ACHP concurs with the NGB's proposed response to the objection, whereupon the NGB will respond to the objection accordingly; or
2. Provide the NGB with recommendations in writing, which the NGB will take into account in reaching a final decision regarding the disputes.
3. Should the ACHP not exercise one of the above options within 30 days after receipt of all pertinent documentation, the NGB may assume the ACHP's concurrence in its proposed response to the objection and proceed accordingly.

B. Any written recommendations or comment provided by the ACHP pursuant to this stipulation will pertain only to the subject of the dispute; the NGB's responsibility to carry out all other actions under this agreement that are not subjects of the dispute will remain unchanged.

VI. Monitoring of Programmatic Agreement

Individual SHPOs, the NCSHPO and the ACHP may review any activities carried out pursuant to this PA upon official request. The NGB will facilitate any requests from individual SHPOs, the NCSHPO and the ACHP to monitor or to review project files or on-site activities for Readiness Center projects pursuant to this PA.



The NCSHPO, at their discretion, may solicit comments annually from individual SHPOs on how they believe the agreement document is working.

VII. Termination of the Programmatic Agreement

A. If the NGB determines that it is unable to comply with the terms of this PA, or if NCSHPO, the NGB, or the ACHP determine that the PA is not being properly implemented, the NGB, the NCSHPO, or the ACHP may propose to the other parties to this PA that it be terminated.

B. The party proposing termination will so notify all parties to this PA in writing, explaining the reasons for proposing termination and affording them at least thirty (30) days to consult and seek alternatives to termination. If, at the end of said period, the party proposing termination has not retracted its proposal to terminate, the PA shall be deemed terminated. At that time, the NGB will notify the state ARNG, SHPO, NCSHPO, and the ACHP, in writing, regarding the termination.

C. If the PA is terminated, the NGB will:

1. Consult according to 36 CFR § 800.14(b) to develop a new PA or,
2. Comply with 36 CFR Part 800 with regard to each undertaking at a Readiness Center.

D. If a specific SHPO determines that the PA is not being properly implemented in its State, that SHPO shall follow the steps in Administrative Stipulation VII. A. and B. above. If such a process leads to a termination, the PA shall no longer apply to the relevant State. However, the other States will continue to follow the PA. The NGB will notify the state ARNG, SHPO, NCSHPO, and the ACHP, in writing, regarding the state-wide termination as part of the annual review and reporting requirement, as described in Administrative Stipulation III.

VIII. Amendment of the Programmatic Agreement



Any signatory to this PA may propose in writing to the NGB that the PA be amended, whereupon the NGB will consult with the signatories to this PA to consider such amendment. The Amendment will go into effect upon written agreement by all signatories.

IX. Expiration and Renewal of the Programmatic Agreement

This PA will take effect on the date it is signed by the last signatory and will remain in effect for 10 years. No extension or modification will be effective unless all signatories have agreed in writing within the 10 year time period. All signatories will meet six months prior to sunset of the Programmatic Agreement to ascertain if renewal and/or revision is desirable.

X. Execution and Implementation

Execution and implementation of this PA evidences that the NGB has afforded the ACHP a reasonable opportunity to comment on the maintenance and repair of Readiness Centers that are historic properties, and that the NGB has taken into account the effects of the undertaking(s) on these historic properties. Execution and compliance with this PA fulfills the NGB's Section 106 responsibilities regarding the maintenance and repair of the Readiness Centers addressed in this PA.



NATIONWIDE PROGRAMMATIC AGREEMENT

For

ARMY NATIONAL GUARD READINESS CENTERS MAINTENANCE AND REPAIR

Among

The NATIONAL GUARD BUREAU

The NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS

The ARMY FEDERAL PRESERVATION OFFICER

And

The ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: *R. W. Carpenter* Date: 22 OCT 2010
Raymond W. Carpenter

Major General, US Army

Acting Director, Army National Guard

By: *Ruth A. Pierpont* Date: 11/19/10

Ms. Ruth Pierpont

President

National Conference of State Historic Preservation Officers

By: *John M. Fowler* Date: 12/10/10

Mr. John M. Fowler

Executive Director

Advisory Council on Historic Preservation



Appendices

Appendix A – Nationwide Historic Context

Appendix B – Listing of Historic Armories Nationwide

Appendix C – Information Regarding HABS III Documentation Standards

Appendix D – Consultation Documentation



Appendix A

Nationwide Armory Historic Context

Can be downloaded in its entirety at:

<https://gkoportal.ngb.army.mil/sites/ARE/C/Cultural/Historic%20Contexts%20Document%20Library/Forms/AllItems.aspx?RootFolder=%2fsites%2fARE%2fC%2fCultural%2fHistoric%20Contexts%20Document%20Library%2fNationwide%20Armory%20Historic%20Context&View=%7bE3C1372E%2d733C%2d43DC%2dbe1B%2d69BD311673%7d>



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Appendix B

Nationwide Listing of Historic Armories



Historic Armories/Readiness Centers (as of 30JUN2010)

Historic Status Codes:

	Individual - National Register Eligible		Site Code	Facility Code	RPA Name	Historic Status	Historic Status Date		
	NREI	Not Yet Evaluated							
								DNE	Contributing Element of National Register Eligible District
State Name	Installation Name	Site Code	Facility Code	RPA Name	Historic Status	Historic Status Date			
1 Alabama	010NG	JFHQ AL ARNG	01D35	THOMAS H MOORER FORT DEPOSIT	00001	ARNG ARMORY	NREI	01/01/1957	
2 Alabama	010NG	JFHQ AL ARNG	01F10	FT WHITTING AFRC MOBILE	00001	ARNG ARMORY	NREI	01/01/1937	
3 Alaska	020NG	JFHQ AK ARNG	02571	NG LITTLE DIOMEDE ARMORY	00001	LITTLE DIOMEDE ARMORY	NREI		
4 Arizona	040NG	JFHQ AZ ARNG	04B85	SILVERLAKE ARMORY	P5440	ARNG ARMORY	NREI	09/05/2006	
5 Arkansas	050NG	JFHQ AR ARNG	05A05	ARKADELPHIA	ARK01	William H Tweedle III Armory	NREI	08/20/2004	
6 Arkansas	050NG	JFHQ AR ARNG	05A30	BENTONVILLE	BEV01	Bentonville Armory	NREI	08/20/2004	
7 Arkansas	050NG	JFHQ AR ARNG	05A50	BRINKLEY	BR101	Brinkley Armory	NREI	08/20/2004	
8 Arkansas	050NG	JFHQ AR ARNG	05B20	FORDYCE	FOR01	Fordyce Armory	NREI	08/20/2004	
9 Arkansas	050NG	JFHQ AR ARNG	05B40	HARRISBURG	HAB01	Josiah Brinkerhoff Armory	NREI	06/22/2005	
10 Arkansas	050NG	JFHQ AR ARNG	05B55	HEBER SPRINGS	HBS01	Heber Springs Armory	NREI	06/22/2005	
11 Arkansas	050NG	JFHQ AR ARNG	05B70	JONESBORO	JON01	Jonesboro Armory	NREI	02/14/2007	
12 Arkansas	050NG	JFHQ AR ARNG	05C10	MARKED TREE	MKT01	Marked Tree Armory	NREI	11/21/2005	
13 Arkansas	050NG	JFHQ AR ARNG	05C15	MARSHALL	MHL01	Marshall Armory	NREI	02/14/2007	
14 Arkansas	050NG	JFHQ AR ARNG	05C40	MOUNTAIN HOME	MTH01	Mountain Home Armory	NREI	06/22/2005	
15 Arkansas	050NG	JFHQ AR ARNG	05C50	N LITTLE ROCK	NLR01	Raymond W Fisher Armory	NREI	11/21/2005	
16 Arkansas	050NG	JFHQ AR ARNG	05C65	PARAGOULD	PAR01	Paragould Armory	NREI	08/20/2004	
17 Arkansas	050NG	JFHQ AR ARNG	05C95	RECTOR	REC01	Rector Armory	NREI	11/21/2005	
18 Arkansas	050NG	JFHQ AR ARNG	05D25	SILLOAM SPRINGS	SIL01	Siloam Springs Armory	NREI	08/20/2004	
19 Arkansas	050NG	JFHQ AR ARNG	05D30	SPRINGDALE	SPR01	Springdale Armory	NREI	08/20/2004	
20 Arkansas	050NG	JFHQ AR ARNG	05D45	VAN BUREN	VAN01	Van Buren Armory	NREI	08/20/2004	
21 Arkansas	050NG	JFHQ AR ARNG	05D50	WALNUT RIDGE	WAL01	Lawrence E Robert Armory	NREI	08/20/2004	
22 Arkansas	050NG	JFHQ AR ARNG	05D65	WEST MEMPHIS	WMP01	West Memphis Armory	NREI	11/21/2005	

23	California	060NG	JFHQ CA ARNG	06A70	BURBANK	01000	BURBANK ARMORY	NREI	06/15/1954
24	California	060NG	JFHQ CA ARNG	06B50	FRESNO CHANCE	01000	FRESNO CHANCE ARMORY	NREI	06/15/2002
25	California	060NG	JFHQ CA ARNG	06C25	LODI	01000	LODI ARMORY	NREI	06/15/1930
26	California	060NG	JFHQ CA ARNG	06C40	LONG BEACH 7TH	01000	LONG BEACH 7TH ARMORY	NREI	06/15/1930
27	California	060NG	JFHQ CA ARNG	06D55	ONTARIO	01000	ONTARIO ARMORY	NREI	06/15/1950
28	California	060NG	JFHQ CA ARNG	06D85	PITTSBURG	01000	PITTSBURG ARMORY	NREI	06/15/1949
29	California	060NG	JFHQ CA ARNG	06E00	POMONA	01000	POMONA (Park) ARMORY	NREI	06/15/1933
30	California	060NG	JFHQ CA ARNG	06E63	SACRAMENTO (B)	01000	SAC B STREET ARMORY	NREI	01/16/1950
31	California	060NG	JFHQ CA ARNG	06E90	SAN BERNARDINO	01000	SAN BERNARDINO ARMORY	NREI	06/15/1950
32	California	060NG	JFHQ CA ARNG	06F65	SANTA BARBARA	01000	SANTA BARBARA ARMORY	NREI	06/15/1938
33	California	060NG	JFHQ CA ARNG	06G85	YUBA CITY	01000	YUBA CITY ARMORY	NREI	06/15/1931
34	Colorado	080NG	JFHQ CO ARNG	08A35	CANON CITY	00204	Canon City Armory	NRLI	08/20/1999
35	Connecticut	090NG	JFHQ CT ARNG	09A10	BRANFORD ARMORY OMS 11	00001	BRANFORD ARMORY	NREI	01/05/1995
36	Connecticut	090NG	JFHQ CT ARNG	09A15	BRISTOL ARMORY	00001	Bristol Armory	NREI	01/05/1995
37	Connecticut	090NG	JFHQ CT ARNG	09A50	HARTFORD ARMORY OMS 8A	00001	ARMORY (JTF HQ)	NREI	01/05/1995
38	Connecticut	090NG	JFHQ CT ARNG	09A60	MANCHESTER ARMORY OMS 7	00001	MANCHESTER ARMORY	NREI	01/05/1995
39	Connecticut	090NG	JFHQ CT ARNG	09A90	NEW HAVEN ARMORY	00001	New Haven Armory	NREI	01/25/1995
40	Connecticut	090NG	JFHQ CT ARNG	09B50	WATERBURY ARMORY	00001	WATERBURY ARMORY	NREI	01/05/1995
41	Florida	120NG	JFHQ FL ARNG	12A35	BONIFAY Readiness Center	00001	Armory Facility 00001 (Bonifay)	NREI	
42	Florida	120NG	JFHQ FL ARNG	12A60	CRESTVIEW Readiness Center	00001	Armory Fac 00001 (Crestview)	NREI	
43	Florida	120NG	JFHQ FL ARNG	12A65	DADE CITY Readiness Center	00001	Armory Fac 00001 (Dade City)	NREI	
44	Florida	120NG	JFHQ FL ARNG	12A80	DELAND Readiness Center	00001	Armory Facility 00001 (Deland)	NREI	
45	Florida	120NG	JFHQ FL ARNG	12A85	EUSTIS Readiness Center	00001	Armory Facility 00001 (Eustis)	NREI	
46	Florida	120NG	JFHQ FL ARNG	12A90	FT LAUDERDALE Readiness Center	00001	Armory Fac 00001 Ft. Lauderdale	NREI	01/01/2003
47	Florida	120NG	JFHQ FL ARNG	12A95	FORT MYERS Readiness Center	00001	Armory Fac 00001	NREI	
48	Florida	120NG	JFHQ FL ARNG	12B00	FORT PIERCE Readiness Center	00001	Armory Fac 00001 (Ft. Pierce)	DNE	
49	Florida	120NG	JFHQ FL ARNG	12B05	HAINES CITY Readiness Center	00001	Armory Fac 00001 (Haines City)	DNE	01/08/2008
50	Florida	120NG	JFHQ FL ARNG	12B10	HOLLYWOOD Readiness Center	00001	Armory Fac 00001 (Hollywood)	NREI	01/01/2004

51	Florida	120NG	JFHQ FL ARNG	12B35	LAKE CITY	00001	Armory Fac 00001 (Lake City)	DNE	
52	Florida	120NG	JFHQ FL ARNG	12B50	LEESBURG Readiness Center	00001	Armory Fac 00001 (Leesburg)	NREI	01/01/2000
53	Florida	120NG	JFHQ FL ARNG	12B85	PALATKA Readiness Center	00001	Armory Facility 00001 (Palatka)	DNE	
54	Florida	120NG	JFHQ FL ARNG	12C20	SANFORD Readiness Center	00001	Armory Facility 00001 (Sanford)	NREI	
55	Florida	120NG	JFHQ FL ARNG	12C30	ST AUGUSTINE Mark Lance RC	00001	Armory Fac 00001 (St. Aug Lance)	NREI	
56	Florida	120NG	JFHQ FL ARNG	12C55	TAMPA Readiness Center	00001	Armory Fac 00001 (Tampa)	NREI	01/15/2005
57	Florida	120NG	JFHQ FL ARNG	12C55	TAMPA Readiness Center	00002	Armory Annex (Tampa)	NREI	01/15/2005
58	Florida	120NG	JFHQ FL ARNG	12C90	WINTER HAVEN Readiness Center	00001	Armory Fac 00001 (Winter Haven)	NREI	01/01/1990
59	Florida	12A01	CAMP BLANDING	12A01	MTC Camp Blanding	03581	ARNG ARMORY (2-111TH)	NRLC	
60	Illinois	170NG	JFHQ IL ARNG	17A25	CHICAGO (MIDWAY ARMORY, AASF #2)	00001	READINESS CENTER / AASF #2	NREI	08/30/2001
61	Illinois	170NG	JFHQ IL ARNG	17A50	CHICAGO (NORTHWEST RC)	00001	NORTHWEST ARMORY	NREI	08/30/2001
62	Illinois	170NG	JFHQ IL ARNG	17A90	DIXON ARMORY	00001	DIXON ARMORY	NREI	08/30/2001
63	Illinois	170NG	JFHQ IL ARNG	17B05	ELGIN ARMORY	00001	ELGIN ARMORY	NREI	08/30/2001
64	Illinois	170NG	JFHQ IL ARNG	17B40	KEWANEE ARMORY FMS 07	00001	KEWANEE ARMORY	NREI	
65	Illinois	170NG	JFHQ IL ARNG	17C65	WAUKEGAN READINESS CENTER	00001	Waukegan Readiness Center	NREI	08/30/2001
66	Indiana	180NG	JFHQ IN ARNG	18A20	ATTICA	00001	Armory	NREI	06/26/2006
67	Indiana	180NG	JFHQ IN ARNG	18A25	BEDFORD	00001	Armory	NREI	06/26/2006
68	Indiana	180NG	JFHQ IN ARNG	18A65	DARLINGTON	00001	Armory	NREI	06/26/2006
69	Indiana	180NG	JFHQ IN ARNG	18B45	INDIANAPOLIS Tyndall	00001	Tyndall Armory	NRLC	06/26/2006
70	Indiana	180NG	JFHQ IN ARNG	18B55	STOUT FIELD INDIANAPOLIS	00008	Armory	NREI	06/26/2006
71	Indiana	180NG	JFHQ IN ARNG	18B55	STOUT FIELD INDIANAPOLIS	00009	Armory	NREI	06/26/2006
72	Indiana	180NG	JFHQ IN ARNG	18B85	LEBANON	00001	Armory	NREI	06/26/2006
73	Indiana	180NG	JFHQ IN ARNG	18B95	LOGANSPOUT	00001	Armory	NREI	06/26/2006
74	Indiana	180NG	JFHQ IN ARNG	18C05	MARION (1938)	00001	Armory	NREI	06/26/2006
75	Indiana	180NG	JFHQ IN ARNG	18C15	MICHIGAN CITY	00001	Armory	NREI	06/26/2006
76	Indiana	180NG	JFHQ IN ARNG	18C35	NEW CASTLE	00001	Armory	NREI	06/26/2006
77	Indiana	180NG	JFHQ IN ARNG	18D10	SPENCER	00001	Armory	NREI	06/26/2006
78	Iowa	190NG	JFHQ IA ARNG	19B95	IOWA CITY	ARMY	ARNG ARMORY	NREI	
79	Kansas	200NG	JFHQ KS ARNG	20A05	ABILENE READINESS CENTER	00100	ABILENE ARMORY	NREI	07/01/2003
80	Kansas	200NG	JFHQ KS ARNG	20A50	CLAY CENTER READINESS CENTER	00100	CLAY CENTER ARMORY	NREI	07/01/2005
81	Kansas	200NG	JFHQ KS ARNG	20B10	GARDEN CITY READINESS CENTER	00100	GARDEN CITY ARMORY	NREI	07/01/2008

82	Kansas	200NG	JFHQ KS ARNG	20B35	HIAWATHA READINESS CENTER	00100	HIAWATHA ARMORY	NREI	08/01/2001
83	Kansas	200NG	JFHQ KS ARNG	20B80	KINGMAN READINESS CENTER	00100	KINGMAN ARMORY	NREI	08/01/2001
84	Kansas	200NG	JFHQ KS ARNG	20C35	NEWTON READINESS CENTER	00100	NEWTON ARMORY	NREI	07/01/2005
85	Kentucky	210NG	JFHQ KY ARNG	21A05	ASHLAND ARMORY	A0501	Readiness Center A0501	NRLI	09/06/2002
86	Kentucky	210NG	JFHQ KY ARNG	21A40	BUECHEL ARMORY	A4001	Readiness Center A4001	NREI	01/01/2007
87	Kentucky	210NG	JFHQ KY ARNG	21A60	CARROLLTON ARMORY	A6001	Readiness Center A6001	NREI	08/11/2009
88	Kentucky	210NG	JFHQ KY ARNG	21A75	DANVILLE ARMORY	A7501	Readiness Center A7501	NRLI	01/01/2004
89	Kentucky	210NG	JFHQ KY ARNG	21A80	ELIZABETHTOWN ARMORY	A8001	READINESS CENTER A8001	NRLI	09/06/2002
90	Kentucky	210NG	JFHQ KY ARNG	21A85	FRANKFORT BOONE NG CENTER	BC100	EOC BLDG ARMORY BC100	NREI	03/01/2005
91	Kentucky	210NG	JFHQ KY ARNG	21B15	HENDERSON ARMORY	B1501	Readiness Center B1501	NRLI	09/06/2002
92	Kentucky	210NG	JFHQ KY ARNG	21B65	MADISONVILLE ARMORY	B6501	READINESS CENTER B6501	NRLI	09/06/2002
93	Kentucky	210NG	JFHQ KY ARNG	21B65	MADISONVILLE ARMORY	B6501	READINESS CENTER B6501	NRLI	09/06/2002
94	Kentucky	210NG	JFHQ KY ARNG	21B85	OLIVE HILL ARMORY	B8501	READINESS CENTER B8501	NREI	08/11/2009
95	Kentucky	210NG	JFHQ KY ARNG	21B90	OWENSBORO ARMORY	B9001	ARMORY B9001	NRLI	09/06/2002
96	Kentucky	210NG	JFHQ KY ARNG	21B95	PADUCAH ARMORY	B9501	Readiness Center B9501	NREI	01/01/2003
97	Kentucky	210NG	JFHQ KY ARNG	21C30	SOMERSET ARMORY	C3001	ARMORY C3001	NRLI	09/06/2002
98	Louisiana	22C50	CAMP BEAUREGARD	22C50	CAMP BEAUREGARD	00904	HHHTRAINING SITE ARMORY	NREI	01/01/1991
99	Maryland	240NG	JFHQ MD ARNG	24B90	BOYD M. COOK ARMORY	00001	ARMORY	NREI	01/01/2044
100	Maryland	240NG	JFHQ MD ARNG	24B91	PVT HENRY COSTIN	00002	ARMORY	NREI	01/01/2044
101	Maryland	240NG	JFHQ MD ARNG	24A10	LTC (MD) E. LESLIE MEDFORD	00001	ARMORY	NREI	01/01/2009
102	Maryland	240NG	JFHQ MD ARNG	24A15	FIFTH REGIMENT	00001	FIFTH REGIMENT ARMORY	NRLI	01/01/1951
103	Maryland	240NG	JFHQ MD ARNG	24A20	LTC MELVIN H. CADE	00001	CADE ARMORY	NREI	01/01/2010
104	Maryland	240NG	JFHQ MD ARNG	24A40	MG WILLIAM J. WITTE ARMORY	00001	MG WILLIAM J. WITTE ARMORY	NREI	01/01/2007
105	Maryland	240NG	JFHQ MD ARNG	24A45	CONG STENY HOYER ARMORY	00001	ARMORY	NREI	01/01/2046
106	Maryland	240NG	JFHQ MD ARNG	24A50	SFC JOHN H. NEWMAN	00001	CHESTERTOWN ARMORY	NRLI	01/01/1980
107	Maryland	240NG	JFHQ MD ARNG	24A55	MG (MD) MAURICE D. TAWES	00001	ARMORY	NRLI	01/01/1977
108	Maryland	240NG	JFHQ MD ARNG	24A60	CPT THOMAS PRICE	00001	ARMORY	NREI	01/01/2010
109	Maryland	240NG	JFHQ MD ARNG	24A70	CSM JEROME M. GROLLMAN	00001	ARMORY	NREI	01/01/2011
110	Maryland	240NG	JFHQ MD ARNG	24A75	BG (MD) LOUIS G. SMITH	00001	ARMORY	NREI	01/01/2026
111	Maryland	240NG	JFHQ MD ARNG	24A85	EDGEWOOD AREA APG	E4305	MG WARREN D. HODGES ARMORY	NREI	01/01/2039
112	Maryland	240NG	JFHQ MD ARNG	24A90	LTC JAMES VICTOR MCCOOL	00001	ARMORY	NRLI	01/01/1964
113	Maryland	240NG	JFHQ MD ARNG	24A99	CPT MICHAEL CRESAP	00001	ARMORY	NREI	01/01/2028

114	Maryland	240NG	JFHQ MD ARNG	24B31	BG (MD) RANDOLPH MILLHOLLAND	00001	ARMORY	NREI	01/01/2028
115	Maryland	240NG	JFHQ MD ARNG	24B55	BG WILLIAM SMALLWOOD	00001	ARMORY	NREI	01/01/2002
116	Maryland	240NG	JFHQ MD ARNG	24B80	CW4 MELVIN SHERR	00001	ARMORY	NREI	01/01/2014
117	Maryland	240NG	JFHQ MD ARNG	24B90	PIKESVILLE MIL RES	00001	PURLEY COOPER ARMORY	NRLI	01/01/1953
118	Maryland	240NG	JFHQ MD ARNG	24C00	COMPTROLLER LOUIS L. GOLDSTEIN	00001	ARMORY	NREI	01/01/2001
119	Maryland	240NG	JFHQ MD ARNG	24C03	MTA CAMP FRETTERD	00114	CAMP FRETTERD ARMORY	NREI	01/01/2051
120	Maryland	240NG	JFHQ MD ARNG	24C05	COL VICTOR P. GILLESPE	00001	ARMORY	NREI	01/01/2027
121	Maryland	240NG	JFHQ MD ARNG	24C20	MG HARRY C. RUHL	00001	ARMORY	NREI	01/01/2030
122	Maryland	240NG	JFHQ MD ARNG	24C21	TOWSON	00001	ARMORY	NRLI	01/01/1983
123	Maryland	240NG	JFHQ MD ARNG	24C31	MG HENRY C. EVANS	00001	ARMORY	NREI	01/01/2030
124	Maryland	240NG	JFHQ MD ARNG	24C35	MG GEORGE M. GELSTON	00001	ARMORY	NREI	01/01/2022
125	Massachusetts	250NG	JFHQ MA ARNG	25178	REHOBOTH-TS NIKE 19 COE #25326	A0C13	ARNG ARMORY	NREC	04/15/2005
126	Massachusetts	250NG	JFHQ MA ARNG	25A75	WESTOVER AFB	07073	ARMORY	NRLC	01/01/1994
127	Massachusetts	250NG	JFHQ MA ARNG	25A80	CLINTON	A0001	ARMORY	NREI	02/28/2003
128	Massachusetts	250NG	JFHQ MA ARNG	25A85	CONCORD	A0001	CONCORD ARMORY	NREI	02/28/2003
129	Massachusetts	250NG	JFHQ MA ARNG	25B20	GREENFIELD	A0001	GREENFIELD ARMORY	NREI	01/01/1984
130	Massachusetts	250NG	JFHQ MA ARNG	25B25	HINGHAM	A0001	HINGHAM ARMORY	NREI	02/28/2003
131	Massachusetts	250NG	JFHQ MA ARNG	25B35	HUDSON	A0001	HUDSON ARMORY	NREI	12/31/2003
132	Massachusetts	250NG	JFHQ MA ARNG	25B55	LYNN	A0001	NATIONAL GUARD READINESS CENTER	NRLI	12/01/1979
133	Massachusetts	250NG	JFHQ MA ARNG	25B75	METHUEN	A0001	ARMORY	NREI	02/28/2003
134	Massachusetts	250NG	JFHQ MA ARNG	25B85	MILFORD PEARL ST	A0001	NATIONAL GUARD READINESS CENTER	NREI	12/01/1978
135	Massachusetts	250NG	JFHQ MA ARNG	25C05	NEWBURYPORT	A0001	NATIONAL GUARD READINESS CENTER	NREI	02/28/2003
136	Massachusetts	250NG	JFHQ MA ARNG	25C40	PLYMOUTH	A0001	NATIONAL GUARD READINESS CENTER	NREI	12/01/1995
137	Massachusetts	250NG	JFHQ MA ARNG	25C45	QUINCY	A0001	QUINCY READINESS CENTER	NREI	12/31/2003
138	Massachusetts	250NG	JFHQ MA ARNG	25D10	WESTFIELD	A0001	WESTFIELD ARMORY	NREI	12/31/2004
139	Michigan	260NG	JFHQ MI ARNG	26A05	ADRIAN	AD001	ARNG ARMORY	NREC	02/01/1996
140	Michigan	260NG	JFHQ MI ARNG	26A15	ALMA	AM001	ARNG ARMORY	NREI	03/24/2003
141	Michigan	260NG	JFHQ MI ARNG	26A50	CADILLAC	CD001	ARNG ARMORY	NREI	02/01/1996
142	Michigan	260NG	JFHQ MI ARNG	26A55	CALUMET	CL001	ARMORY	NREC	02/01/1996

143	Michigan	260NG	JFHQ MI ARNG	26A90	FLINT	FL001	ARNG ARMORY	NREI	02/01/1996
144	Michigan	260NG	JFHQ MI ARNG	26B50	IRONWOOD	IW001	ARNG ARMORY	NREI	01/01/2002
145	Michigan	260NG	JFHQ MI ARNG	26B60	JACKSON	JC001	ARNG ARMORY	NREI	02/01/1996
146	Michigan	260NG	JFHQ MI ARNG	26B75	LANSING ARTILLERY	LA001	ARNG ARMORY	NREI	02/01/1996
147	Michigan	260NG	JFHQ MI ARNG	26C15	MONROE	MR001	ARNG ARMORY	NREI	02/01/1996
148	Michigan	260NG	JFHQ MI ARNG	26C30	OWOSSO	OW001	ARNG ARMORY	NREI	02/01/1996
149	Minnesota	270NG	JFHQ MN ARNG	27C10	NORTHFIELD NG ARMORY	18928	SANITARY SEWER ARMORY	NREI	09/17/1994
150	Missouri	290NG	JFHQ MO ARNG	29A05	ALBANY	00001	NATIONAL GAURD ARMORY	NREI	
151	Missouri	290NG	JFHQ MO ARNG	29A42	CARROLLTON	00001	NATIONAL GUARD ARMORY	NREI	
152	Missouri	290NG	JFHQ MO ARNG	29A50	CHILlicothe	00001	ARNG ARMORY	NREI	
153	Missouri	290NG	JFHQ MO ARNG	29A75	DONIPHAN	00001	ARNG ARMORY	NREI	
154	Missouri	290NG	JFHQ MO ARNG	29C75	JEFFERSON BKS ST LOUIS	00025	ARNG ARMORY	NRLC	
155	Missouri	290NG	JFHQ MO ARNG	29C75	JEFFERSON BKS ST LOUIS	00026	ARNG ARMORY	NRLC	
156	Missouri	290NG	JFHQ MO ARNG	29C75	JEFFERSON BKS ST LOUIS	00027	ARNG ARMORY	NRLC	
157	Missouri	290NG	JFHQ MO ARNG	29C75	JEFFERSON BKS ST LOUIS	00078	ARNG ARMORY	NRLC	
158	Missouri	290NG	JFHQ MO ARNG	29D40	WEST PLAINS	00001	NATIONAL GUARD ARMORY	NREI	
159	Montana	300NG	JFHQ MT ARNG	30B20	MILES CITY READINESS CENTER	00001	ARNG READINESS CENTER	NCE	
160	Montana	300NG	JFHQ MT ARNG	30B40	SIDNEY	00001	ARNG READINESS CENTER	NCE	
161	New Hampshire	330NG	JFHQ NH ARNG	33A05	BERLIN READINESS CENTER	00001	BERLIN READINESS CENTER	NREI	09/27/2006
162	New Hampshire	330NG	JFHQ NH ARNG	33A30	HILLSBOROUGH READINESS CENTER	00001	HILLSBOROUGH READINESS CENTER	NREI	03/23/2006
163	New Hampshire	330NG	JFHQ NH ARNG	33A40	KEENE READINESS CENTER	00001	KEENE READINESS CENTER	NREI	05/13/2009
164	New Hampshire	330NG	JFHQ NH ARNG	33A45	LANCASTER READINESS CENTER	00001	LANCASTER READINESS CENTER	NREI	09/27/2006
165	New Hampshire	330NG	JFHQ NH ARNG	33A50	LEBANON READINESS CENTER	00001	LEBANON READINESS CENTER	NREI	03/23/2006
166	New Hampshire	330NG	JFHQ NH ARNG	33A55	LITTLETON READINESS CENTER	00001	LITTLETON READINESS CENTER	NREI	03/23/2006
167	New Hampshire	330NG	JFHQ NH ARNG	33A60	MANCHESTER READINESS CENTER	00001	MANCHESTER READINESS CENTER	NREI	04/21/1999
168	New Hampshire	330NG	JFHQ NH ARNG	33A65	MILFORD READINESS CENTER	00001	MILFORD READINESS CENTER	NREI	03/23/2006
169	New Hampshire	330NG	JFHQ NH ARNG	33A70	NASHUA READINESS CENTER	00001	NASHUA READINESS CENTER	NREI	05/13/2009
170	New Hampshire	330NG	JFHQ NH ARNG	33A75	PETERBOROUGH READINESS CENTER	00001	PETERBOROUGH READINESS CENTER	NREI	03/23/2006
171	New Hampshire	330NG	JFHQ NH ARNG	33A85	PORTSMOUTH READINESS CENTER	00001	PORTSMOUTH READINESS CENTER	NREI	02/25/2009

172	New Hampshire	330NG	JFHQ NH ARNG	33A95	SOMERSWORTH READINESS CENTER	00001	SOMERSWORTH READINESS CENTER	NREI	03/23/2006
173	New Jersey	340NG	JFHQ NJ ARNG	34A05	ATLANTIC CITY	00001	ARMORY	NREI	02/02/1999
174	New Jersey	340NG	JFHQ NJ ARNG	34A30	BURLINGTON	00001	ARMORY	NREI	09/10/2004
175	New Jersey	340NG	JFHQ NJ ARNG	34B05	JERSEY CITY	00001	ARMORY	NREI	09/10/2004
176	New Jersey	340NG	JFHQ NJ ARNG	34B10	LAKEHURST TS NAVAL AIR STATION	00129	ARMORY	NHLC	
177	New Jersey	340NG	JFHQ NJ ARNG	34B40	MORRISTOWN	00001	ARMORY	NREI	09/10/2004
178	New Jersey	340NG	JFHQ NJ ARNG	34B75	PLAINFIELD	00001	ARMORY	NREI	09/10/2004
179	New Jersey	340NG	JFHQ NJ ARNG	34C05	TEANECK	00001	ARMORY	NREI	09/10/2004
180	New Jersey	340NG	JFHQ NJ ARNG	34C25	VINELAND	00001	ARMORY	NREI	09/10/2004
181	New Jersey	340NG	JFHQ NJ ARNG	34C35	WESTFIELD	00001	ARMORY	NREI	09/10/2004
182	New Jersey	340NG	JFHQ NJ ARNG	34C40	WEST ORANGE	00001	ARMORY	NREI	09/10/2004
183	New Jersey	340NG	JFHQ NJ ARNG	34C50	WOODBURY	00001	ARMORY	NREI	09/10/2004
184	New York	360NG	JFHQ NY ARNG	36A45	BINGHAMTON ARMORY/FMS 13	00001	READINESS CENTER	NREI	05/01/1994
185	New York	360NG	JFHQ NY ARNG	36A70	MARCY AVE ARMORY	00001	READINESS CENTER	NREI	05/01/1994
186	New York	360NG	JFHQ NY ARNG	36A75	BEDFORD AVE ARMORY	00001	READINESS CENTER	NREI	05/01/1994
187	New York	360NG	JFHQ NY ARNG	36A85	CONNECTICUT ST ARMORY/FMS 10	00001	ARNG ARMORY	NRLI	12/01/1995
188	New York	360NG	JFHQ NY ARNG	36A95	MASTEN AVE ARMORY/FMS 1	00001	READINESS CENTER	NREI	01/05/1993
189	New York	360NG	JFHQ NY ARNG	36B40	GENEVA ARMORY	00001	READINESS CENTER	NHLC	02/03/1995
190	New York	360NG	JFHQ NY ARNG	36B50	GLOVERSVILLE ARMORY	00001	READINESS CENTER	NRLI	02/03/1995
191	New York	360NG	JFHQ NY ARNG	36B65	HOOSICK FALLS ARMORY	00001	READINESS CENTER	NRLI	02/03/1995
192	New York	360NG	JFHQ NY ARNG	36B70	HORNELL ARMORY	00001	READINESS CENTER	NRLI	06/05/1980
193	New York	360NG	JFHQ NY ARNG	36B90	JAMAICA ARMORY/FMS 9	00001	READINESS CENTER	NREI	01/05/1993
194	New York	360NG	JFHQ NY ARNG	36B95	JAMESTOWN ARMORY/FMS 2	00001	READINESS CENTER	NRLI	12/01/1995
195	New York	360NG	JFHQ NY ARNG	36C00	KINGSTON RC / FMS 7	00001	READINESS CENTER	NREI	01/05/1993
196	New York	360NG	JFHQ NY ARNG	36C45	NEWBURGH ARMORY	00001	READINESS CENTER	NREI	01/05/1993
197	New York	360NG	JFHQ NY ARNG	36C50	LEXINGTON AVE ARMORY	00001	READINESS CENTER	NHLC	06/19/1996
198	New York	360NG	JFHQ NY ARNG	36C60	PARK AVE ARMORY	00001	READINESS CENTER	NHLC	01/05/1986
199	New York	360NG	JFHQ NY ARNG	36C70	FIFTH AVE ARMORY	00001	READINESS CENTER	NRLI	01/28/1994
200	New York	360NG	JFHQ NY ARNG	36C85	OGDENSBURG ARMORY	00001	READINESS CENTER	NRLI	02/03/1995
201	New York	360NG	JFHQ NY ARNG	36C95	OLEAN ARMORY	00001	READINESS CENTER	NRLI	02/03/1995
202	New York	360NG	JFHQ NY ARNG	36D30	PEEKSKILL ARMORY	00001	READINESS CENTER	NREI	01/05/1993
203	New York	360NG	JFHQ NY ARNG	36D40	POUGHKEEPSIE ARMORY	00001	READINESS CENTER	NRLI	11/26/1982

204	New York	360NG	JFHQ NY ARNG	36E00	STATEN ISLAND ARMORY / CSMS B	00001	READINESS CENTER	NREI	01/05/1993
205	New York	360NG	JFHQ NY ARNG	36E35	UTICA RC / FMS 6	00001	READINESS CENTER	NRLI	02/03/1995
206	New York	360NG	JFHQ NY ARNG	36E50	WHITEHALL ARMORY/FMS 15	00001	READINESS CENTER	NRLI	02/03/1995
207	North Carolina	370NG	JFHQ NC ARNG	37A50	BURLINGTON	00001	BURLINGTON READINESS CENTER	NREI	
208	North Carolina	370NG	JFHQ NC ARNG	37D55	RED SPRINGS	00001	Armory	NREI	
209	North Carolina	370NG	JFHQ NC ARNG	37D75	ROCKY MOUNT	00001	Armory	NREI	
210	North Carolina	370NG	JFHQ NC ARNG	37E45	STATESVILLE	00001	Armory	NREI	
211	Oklahoma	400NG	JFHQ OK ARNG	40A35	Anadarko Readiness Center	AN100	Readiness Center	NRLI	05/20/1994
212	Oklahoma	400NG	JFHQ OK ARNG	40A60	Blackwell Readiness Center	BL100	Readiness Center	NRLI	09/08/1988
213	Oklahoma	400NG	JFHQ OK ARNG	40A80	Cherokee Readiness Center	CHE00	Readiness Center	NRLI	09/08/1988
214	Oklahoma	400NG	JFHQ OK ARNG	40B00	Clinton Readiness Center	CLI00	Readiness Center	NRLI	04/07/1994
215	Oklahoma	400NG	JFHQ OK ARNG	40B05	Cushing Readiness Center	CU100	Readiness Center	NRLI	05/20/1994
216	Oklahoma	400NG	JFHQ OK ARNG	40B40	Enid Readiness Center	EN100	Readiness Center	NRLI	09/08/1988
217	Oklahoma	400NG	JFHQ OK ARNG	40B45	Eufaula Readiness Center	EU100	Readiness Center	NRLI	05/20/1994
218	Oklahoma	400NG	JFHQ OK ARNG	40B55	Guthrie Readiness Center	GU100	Readiness Center	NRLI	09/08/1994
219	Oklahoma	400NG	JFHQ OK ARNG	40B70	Healdton Readiness Center	HEA00	Readiness Center	NRLI	04/07/1994
220	Oklahoma	400NG	JFHQ OK ARNG	40B95	Hominy Readiness Center	HOM00	Readiness Center	NRLI	05/20/1994
221	Oklahoma	400NG	JFHQ OK ARNG	40C15	Kingfisher Readiness Center	KI100	Readiness Center	NRLI	04/07/1994
222	Oklahoma	400NG	JFHQ OK ARNG	40C20	Konowa Readiness Center	KO100	Readiness Center	NRLI	05/20/1994
223	Oklahoma	400NG	JFHQ OK ARNG	40C25	Lawton Readiness Center	LA100	Readiness Center	NRLI	06/05/2007
224	Oklahoma	400NG	JFHQ OK ARNG	40C45	Mangum Readiness Center	MAN00	Readiness Center	NRLI	05/20/1994
225	Oklahoma	400NG	JFHQ OK ARNG	40C50	Marlow Readiness Center	MAR00	Readiness Center	NRLI	04/07/1994
226	Oklahoma	400NG	JFHQ OK ARNG	40C55	McAlester Readiness Center	MC100	Readiness Center	NRLI	09/08/1988
227	Oklahoma	400NG	JFHQ OK ARNG	40D10	23rd St. Readiness Center	23100	Readiness Center	NREI	
228	Oklahoma	400NG	JFHQ OK ARNG	40D10	23rd St. Readiness Center	23101	Readiness Center	NREI	
229	Oklahoma	400NG	JFHQ OK ARNG	40D50	Pawhuska	PAH00	Readiness Center	NRLI	05/20/1994
230	Oklahoma	400NG	JFHQ OK ARNG	40D55	Pawnee Readiness Center	PAW00	Readiness Center	NRLI	05/20/1994
231	Oklahoma	400NG	JFHQ OK ARNG	40D60	Perry Readiness Center	PE100	Readiness Center	NRLI	09/08/1988
232	Oklahoma	400NG	JFHQ OK ARNG	40E10	Sulphur Readiness Center	SU100	Readiness Center	NRLI	05/20/1994
233	Oklahoma	400NG	JFHQ OK ARNG	40E20	Tishomingo Readiness Center	TI100	Readiness Center	NRLI	05/05/1994
234	Oklahoma	400NG	JFHQ OK ARNG	40E55	Weatherford Readiness Center	WEA00	Readiness Center	NRLI	05/20/1994
235	Oregon	410NG	JFHQ OR ARNG	41A35	CAMP WITTHYCOMBE CLACKAMAS	06400	Armory Type Function	NREI	10/09/1997

236	Oregon	410NG	JFHQ OR ARNG	41A55	COTTAGE GROVE ARMORY	01901	Cottage Grove Armory	NRLC	12/15/1993
237	Oregon	410NG	JFHQ OR ARNG	41A60	DALLAS ARMORY	02001	Dallas Armory	NREI	01/01/1911
238	Oregon	410NG	JFHQ OR ARNG	41B25	MILTON FREEWATER ARMORY	03401	Milton Freewater Armory	NREI	01/01/2004
239	Oregon	410NG	JFHQ OR ARNG	41B40	ONTARIO ARMORY	03701	Ontario Armory	NREI	01/01/2000
240	Oregon	410NG	JFHQ OR ARNG	41B90	ST HELENS ARMORY	04601	St Helens Armory	NREI	01/01/2005
241	Pennsylvania	420NG	JFHQ PA ARNG	42A15	ALTOONA READINESS CENTER	ARM01	READINESS CENTER	NRLI	05/09/1991
242	Pennsylvania	420NG	JFHQ PA ARNG	42A25	BELLFONTE READINESS CENTER	00001	READINESS CENTER	NRLI	12/22/1989
243	Pennsylvania	420NG	JFHQ PA ARNG	42A30	BERWICK READINESS CENTER	ARM01	READINESS CENTER	NRLI	12/22/1989
244	Pennsylvania	420NG	JFHQ PA ARNG	42A35	BETHLEHEM READINESS CENTER	ARM01	READINESS CENTER	NRLI	11/14/1991
245	Pennsylvania	420NG	JFHQ PA ARNG	42A40	BLAIRSVILLE RC - VACANT	00001	READINESS CENTER - VACANT	NRLI	12/22/1989
246	Pennsylvania	420NG	JFHQ PA ARNG	42A45	BRADFORD READINESS CENTER	ARM01	READINESS CENTER	NRLI	05/09/1991
247	Pennsylvania	420NG	JFHQ PA ARNG	42A60	CANONSBURG READINESS CENTER	00001	ARNG READINESS CENTER	NRLI	12/22/1989
248	Pennsylvania	420NG	JFHQ PA ARNG	42A75	CARLISLE RC	00001	READINESS CENTER, STONE HOUSE	NRLI	12/22/1989
249	Pennsylvania	420NG	JFHQ PA ARNG	42A75	CARLISLE RC	00002	READINESS CENTER, STONE BARN	NRLI	12/22/1989
250	Pennsylvania	420NG	JFHQ PA ARNG	42A90	CLEARFIELD RC	00001	READINESS CENTER/FMS	NRLI	12/22/1989
251	Pennsylvania	420NG	JFHQ PA ARNG	42B05	CONNELLSVILLE RC - VACANT	00001	READINESS CENTER	NRLI	11/14/1991
252	Pennsylvania	420NG	JFHQ PA ARNG	42B15	PITTSBURGH CSMS	00001	READINESS CENTER	NRLI	11/14/1991
253	Pennsylvania	420NG	JFHQ PA ARNG	42B20	CORRY READINESS CENTER	00001	READINESS CENTER	NRLI	05/09/1991
254	Pennsylvania	420NG	JFHQ PA ARNG	42B30	EAST STROUDSBURG RC	00001	READINESS CENTER	NRLI	05/09/1991
255	Pennsylvania	420NG	JFHQ PA ARNG	42B40	ERIE RC	00001	READINESS CENTER	NRLI	12/22/1989
256	Pennsylvania	420NG	JFHQ PA ARNG	42B57	FORD CITY READINESS CENTER	ARMOR	READINESS CENTER	NRLI	12/22/1989
257	Pennsylvania	420NG	JFHQ PA ARNG	42B60	GETTYSBURG READINESS CENTER	00001	READINESS CENTER	NRLI	03/20/1990
258	Pennsylvania	420NG	JFHQ PA ARNG	42B75	HAMBURG READINESS CENTER	00001	READINESS CENTER	NRLI	05/09/1991
259	Pennsylvania	420NG	JFHQ PA ARNG	42B90	HARRISBURG RC	00007	READINESS CENTER	NREI	
260	Pennsylvania	420NG	JFHQ PA ARNG	42B90	HARRISBURG RC	00009	READINESS CENTER	NREI	
261	Pennsylvania	420NG	JFHQ PA ARNG	42C07	HOLLIDAYSBURG READINESS CENTER	00001	READINESS CENTER	NREI	
262	Pennsylvania	420NG	JFHQ PA ARNG	42C20	HUNTINGDON READINESS CENTER	00001	READINESS CENTER	NRLC	10/24/1989
263	Pennsylvania	420NG	JFHQ PA ARNG	42C25	INDIANA READINESS CENTER	00004	READINESS CENTER	NRLI	11/14/1991
264	Pennsylvania	420NG	JFHQ PA ARNG	42C40	KANE READINESS CENTER	00001	READINESS CENTER	NRLI	05/09/1991
265	Pennsylvania	420NG	JFHQ PA ARNG	42C60	LANCASTER READINESS CENTER	00001	READINESS CENTER	NRLI	11/14/1991

266	Pennsylvania	420NG	JFHQ PA ARNG	42C70	TORRANCE RC	00001	READINESS CENTER, VACANT	NRLI	12/22/1989
267	Pennsylvania	420NG	JFHQ PA ARNG	42C85	LEWISBURG READINESS CENTER	00001	READINESS CENTER	NRLI	11/14/1991
268	Pennsylvania	420NG	JFHQ PA ARNG	42C90	LEWISTOWN READINESS CENTER	00001	READINESS CENTER	NRLI	05/09/1991
269	Pennsylvania	420NG	JFHQ PA ARNG	42C95	LIGONIER RC - VACANT	00001	ARNG READINESS CENTER	NRLI	05/09/1991
270	Pennsylvania	420NG	JFHQ PA ARNG	42D00	LOCK HAVEN RC	00001	READINESS CENTER	NREI	
271	Pennsylvania	420NG	JFHQ PA ARNG	42D15	MEADVILLE READINESS CENTER	00001	READINESS CENTER	NREI	07/18/1984
272	Pennsylvania	420NG	JFHQ PA ARNG	42D22	MT PLEASANT READINESS CENTER	00001	READINESS CENTER	NRLI	12/22/1989
273	Pennsylvania	420NG	JFHQ PA ARNG	42D60	OIL CITY READINESS CENTER	00001	READINESS CENTER	NRLI	05/09/1991
274	Pennsylvania	420NG	JFHQ PA ARNG	42D70	PHILADELPHIA OGONTZ RC	00001	READINESS CENTER	NRLI	11/14/1991
275	Pennsylvania	420NG	JFHQ PA ARNG	42D75	PHILADELPHIA LANCASTER RC	00001	READINESS CENTER	NRLI	11/14/1991
276	Pennsylvania	420NG	JFHQ PA ARNG	42D85	PHILADELPHIA SOUTH 23RD RC	00001	READINESS CENTER	NREI	03/20/1990
277	Pennsylvania	420NG	JFHQ PA ARNG	42D95	PINE GROVE READINESS CENTER	00001	READINESS CENTER	NRLC	12/31/1987
278	Pennsylvania	420NG	JFHQ PA ARNG	42E00	PITTSBURGH HUNT RC	00001	READINESS CENTER/FMS	NRLI	11/14/1991
279	Pennsylvania	420NG	JFHQ PA ARNG	42E15	POTTSTOWN READINESS CENTER	00001	READINESS CENTER	NRLC	07/16/1985
280	Pennsylvania	420NG	JFHQ PA ARNG	42E20	POTTSVILLE READINESS CENTER	00001	READINESS CENTER	NRLI	11/14/1991
281	Pennsylvania	420NG	JFHQ PA ARNG	42E35	RIDGWAY READINESS CENTER	00001	READINESS CENTER	NRLI	12/22/1989
282	Pennsylvania	420NG	JFHQ PA ARNG	42E45	SCOTTDALE RC - VACANT	00001	READINESS CENTER, VACANT	NRLI	05/09/1991
283	Pennsylvania	420NG	JFHQ PA ARNG	42E50	SCRANTON READINESS CENTER	00001	READINESS CENTER	NRLI	12/22/1989
284	Pennsylvania	420NG	JFHQ PA ARNG	42E77	SPRING CITY READINESS CENTER	00001	READINESS CENTER	NREI	
285	Pennsylvania	420NG	JFHQ PA ARNG	42E80	SUNBURY READINESS CENTER	00002	READINESS CENTER	NRLI	12/22/1989
286	Pennsylvania	420NG	JFHQ PA ARNG	42E90	TYRONE READINESS CENTER	00001	ARNG READINESS CENTER	NRLI	12/22/1989
287	Pennsylvania	420NG	JFHQ PA ARNG	42F05	WAYNESBORO READINESS CENTER	00001	ARNG READINESS CENTER	NRLI	12/22/1989
288	Pennsylvania	420NG	JFHQ PA ARNG	42F10	WAYNESBURG READINESS CENTER	00001	ARNG READINESS CENTER	NRLC	06/04/1983
289	Pennsylvania	420NG	JFHQ PA ARNG	42F20	WEST CHESTER READINESS CENTER	00001	ARNG READINESS CENTER	NRLC	11/30/1984
290	Pennsylvania	420NG	JFHQ PA ARNG	42F35	WILKES BARRE/ KINGSTON RC	ARM01	WILKES BARRE KINGSTON 42F35 READINESS CENTER	NRLI	12/22/1989
291	Pennsylvania	420NG	JFHQ PA ARNG	42F40	WILLIAMSPORT READINESS CENTER	ARMR1	READINESS CENTER	NRLI	11/14/1991
292	Pennsylvania	420NG	JFHQ PA ARNG	42F40	WILLIAMSPORT READINESS CENTER	ARMR2	READINESS CENTER	NRLI	11/14/1991

293	Pennsylvania	420NG	JFHQ PA ARNG		42F40	WILLIAMSPORT READINESS CENTER	STOR1	ARMORY STORAGE	NREI	
294	Pennsylvania	420NG	JFHQ PA ARNG		42F60	YORK GEORGE READINESS CENTER	00001	READINESS CENTER	NRLI	03/20/1990
295	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07009	READINESS CENTER	NREC	
296	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07010	READINESS CENTER	NREC	
297	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07011	READINESS CENTER	NREC	
298	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07012	READINESS CENTER	NREC	
299	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07014	READINESS CENTER	NREC	
300	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07015	ARMORY	NREC	
301	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07016	ARMORY	NREC	
302	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07017	ARMORY	NREC	
303	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07018	ARMORY	NREC	
304	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07019	ARMORY	NREC	
305	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07020	ARMORY	NREC	
306	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07024	ARMORY	NREC	
307	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07025	ARMORY	NREC	
308	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	07029	ARMORY	NREC	
309	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	09025	READINESS CENTER	NREC	
310	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	09026	READINESS CENTER	NREC	
311	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	09027	READINESS CENTER	NREC	
312	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE		42307	FORT INDIANTOWN GAP	09028	READINESS CENTER	NREC	

313	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09030	READINESS CENTER	NREC	
314	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09033	READINESS CENTER	NREC	
315	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09035	READINESS CENTER	NREC	
316	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09036	READINESS CENTER	NREC	
317	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09038	READINESS CENTER	NREC	
318	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09039	READINESS CENTER	NREC	
319	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09048	READINESS CENTER	NREC	
320	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09049	READINESS CENTER	NREC	
321	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09050	READINESS CENTER	NREC	
322	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09051	READINESS CENTER	NREC	
323	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09052	READINESS CENTER	NREC	
324	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09053	ARMORY	NREC	
325	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	09068	ARMORY	NREC	
326	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	11011	BFE ARMORY SUPPLY WHSE	NREC	
327	Pennsylvania	42307	FORT INDIANTOWN GAP TRNG SITE	42307	FORT INDIANTOWN GAP	13070	ARMORY	NREC	
328	Puerto Rico	RQ0NG	JFHQ RQ ARNG	RQB15	SAN JUAN READINESS CENTER	00001	SAN JUAN ARMORY	NREI	
329	Tennessee	470NG	JFHQ TN ARNG	47A50	CHATTANOOGA	0001A	ARMORY	NREC	09/12/1994
330	Tennessee	470NG	JFHQ TN ARNG	47A50	CHATTANOOGA	0001B	ARMORY	NREC	09/12/1994
331	Tennessee	470NG	JFHQ TN ARNG	47B71	KNOXVILLE CONCORD ST	00003	CONCORD ST ARMORY	NREI	11/08/2005
332	Texas	480NG	JFHQ TX ARNG	48A35	ARLINGTON	00001	READINESS CENTER	NREI	01/01/2004
333	Texas	480NG	JFHQ TX ARNG	48A50	CAMP MABRY	00011	READINESS CENTER	NRLC	08/30/1996
334	Texas	480NG	JFHQ TX ARNG	48A50	CAMP MABRY	00032	READINESS CENTER	NRLC	08/30/1996
335	Texas	480NG	JFHQ TX ARNG	48E50	KERRVILLE	00001	READINESS CENTER	NREI	01/01/2005
336	Texas	480NG	JFHQ TX ARNG	48F10	LUFKIN	00001	READINESS CENTER	NREI	04/01/2005

337	Texas	480NG	JFHQ TX ARNG	48F95	PAMPA	00001	READINESS CENTER	NREI	04/01/2005
338	Utah	490NG	JFHQ UT ARNG	49A05	AMERICAN FORK ARMORY/FMS 3A	00001	AMERICAN FORK ARMORY/FMS 6	NREI	
339	Utah	490NG	JFHQ UT ARNG	49A40	FILLMORE ARMORY/FMS WS2 (SO)	00001	FILLMORE ARMORY/FMS 5 WS2	NREI	
340	Utah	490NG	JFHQ UT ARNG	49B35	SPRINGVILLE ARMORY	00001	SPRINGVILLE ARMORY	NREI	10/09/2003
341	Vermont	500NG	JFHQ VT ARNG	50A05	BENNINGTON	A0501	BENNINGTON ARMORY	NREC	
342	Vermont	500NG	JFHQ VT ARNG	50A25	TS CAMP JOHNSON	00014	FAMILY READINESS CENTER	NREC	01/01/2000
343	Vermont	500NG	JFHQ VT ARNG	50A75	RUTLAND	A7501	RUTLAND ARMORY	NREC	
344	Vermont	500NG	JFHQ VT ARNG	50A85	ST ALBANS	A8501	ST ALBANS ARMORY	NREC	
345	Virginia	510NG	JFHQ VA ARNG	51A10	BEDFORD	00001	ARNG ARMORY	NREI	
346	Virginia	510NG	JFHQ VA ARNG	51A20	BIG STONE GAP	00001	ARNG ARMORY	NREI	
347	Virginia	510NG	JFHQ VA ARNG	51A40	CHATHAM	00001	ARNG ARMORY	NREI	
348	Virginia	510NG	JFHQ VA ARNG	51A50	CHRISTIANSBURG	00001	ARNG ARMORY	NREI	
349	Virginia	510NG	JFHQ VA ARNG	51A90	FARMVILLE	00001	ARNG ARMORY	NREI	
350	Virginia	510NG	JFHQ VA ARNG	51A95	FRANKLIN	00001	ARNG ARMORY	NREI	
351	Virginia	510NG	JFHQ VA ARNG	51B00	FREDERICKSBURG	00001	ARNG ARMORY	NREI	
352	Virginia	510NG	JFHQ VA ARNG	51B10	GATE CITY	00001	ARNG ARMORY	NREI	
353	Virginia	510NG	JFHQ VA ARNG	51B40	MANASSAS	00001	ARNG ARMORY	NREI	
354	Virginia	510NG	JFHQ VA ARNG	51B40	MANASSAS	00001	ARNG ARMORY	NREI	
355	Virginia	510NG	JFHQ VA ARNG	51B80	PULASKI	00001	ARNG ARMORY	NREI	
356	Virginia	510NG	JFHQ VA ARNG	51B85	RADFORD	00001	ARNG ARMORY	NREI	
357	Virginia	510NG	JFHQ VA ARNG	51C15	ROANOKE	00001	ARNG ARMORY	NREI	
358	Virginia	510NG	JFHQ VA ARNG	51C15	ROANOKE	00001	ARNG ARMORY	NREI	
359	Virginia	510NG	JFHQ VA ARNG	51C25	ROCKY MOUNT	00001	ARNG ARMORY	NREI	
360	Virginia	510NG	JFHQ VA ARNG	51C50	STAUNTON	00001	ARNG ARMORY	NREI	
361	Virginia	510NG	JFHQ VA ARNG	51C75	WARRENTON	00001	ARNG ARMORY	NREI	
362	Virginia	510NG	JFHQ VA ARNG	51C75	WARRENTON	00001	ARNG ARMORY	NREI	
363	Washington	530NG	JFHQ WA ARNG	53555	CAMP MURRAY	00003	NG READINESS CENTER - J9	NREC	

Appendix C

Information Regarding HABS Level III Documentation Standards

Can be downloaded in its entirety at:

<http://www.nps.gov/history/hdp/standards/standards.pdf>



Appendix D
Consultation Documentation

Details regarding comments associated with the development of the Nationwide PA are available at NGB as part of the Administrative Record, Jul 2008 compiled by Burns and

McDonnell





Preserving America's Heritage

CASE DIGEST: SECTION 106 IN ACTION



ADVISORY COUNCIL ON HISTORIC PRESERVATION
SUMMER 2011

An independent federal agency, the ACHP promotes the preservation, enhancement, and productive use of our nation's historic resources and advises the President and Congress on national historic preservation policy. It also provides a forum for influencing federal activities, programs, and policies that affect historic properties. In addition, the ACHP has a key role in carrying out the Preserve America program.

Milford Wayne Donaldson, of Sacramento, California, is chairman of the 23-member council, which is served by a professional staff with offices in Washington, D.C. For more information about the ACHP, contact:

Advisory Council on Historic Preservation
1100 Pennsylvania Avenue NW, Suite 803
Washington, D.C. 20004
Phone: 202-606-8503
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This report is available online at www.achp.gov/casedigest

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Cover: STS-135 *Atlantis* Prelaunch. The space shuttle *Atlantis* is seen shortly after the rotating service structure was rolled back at launch pad 39a, July 7, 2011, at the NASA Kennedy Space Center in Cape Canaveral, Florida. *Atlantis* lifted off July 8 on the final flight of the shuttle program on a mission to the International Space Station. (Photo Credit: NASA/Bill Ingalls)

ABOUT THIS REPORT

Section 106 of the National Historic Preservation Act requires federal agencies to consider historic preservation values when planning their activities. In the Section 106 process, a federal agency must identify affected historic properties, evaluate the proposed action's effects, and then explore ways to avoid or mitigate those effects.

The federal agency often conducts this process with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers, representatives of Indian tribes and Native Hawaiian organizations, and other parties with an interest in the issues.

Sometimes a Programmatic Agreement (PA) or a Memorandum of Agreement (MOA) is reached and signed by the project's consulting parties. A PA clarifies roles, responsibilities, and expectations of all parties engaged in large and complex federal projects that may have an effect on a historic property. An MOA specifies the mitigation measure that the lead federal agency must take to ensure the protection of a property's historic values.

Each year thousands of federal actions undergo Section 106 review. The vast majority of cases are routine and are resolved at the state or tribal level, without the ACHP's involvement. However some cases present issues or challenges that warrant the ACHP's involvement.

This report presents a representative cross-section of undertakings that illustrate the variety and complexity of federal activities that the ACHP is currently engaged in. In addition, the ACHP's Web site www.achp.gov contains a useful library of information about the ACHP, Section 106 review, and the national historic preservation program.

NATIONWIDE

Project: Closed Case: Nationwide Programmatic Agreement for Army National Guard Readiness Centers Maintenance and Repair

Agencies: National Guard Bureau

Contact: Katharine R. Kerr kkerr@achp.gov

In December 2010, a nationwide Programmatic Agreement among the National Guard Bureau, the National Conference of State Historic Preservation Officers, and the ACHP was executed regarding maintenance and repair projects for readiness centers, also known as armories.



In 2006, the National Guard Bureau (NGB) opened consultation with the National Conference of State Historic Preservation Officers (NCSHPO) and the ACHP regarding the development of a program alternative to streamline Section 106 compliance for maintenance and repair projects for all federally owned or federally supported readiness centers in all 50 states, Puerto Rico, the U.S. Virgin Islands, Guam, and the District of Columbia. Routine maintenance is defined as regular and general upkeep of a readiness center against normal wear and tear above ground. The Programmatic Agreement (PA) does not address undertakings that could cause ground disturbance or that may affect archaeological sites, except those areas previously designated by an easement (e.g., natural gas lines) or areas where disturbance has already occurred (e.g., sidewalks) for the first six inches in depth of ground disturbance. The PA also does not apply to replacement or repair of wall insulation.

An individual state Army National Guard (ARNG) Cultural Resources Manager is responsible for determining whether a proposed activity meets the definition of an exempted undertaking under the PA. If the proposed activity meets one or more of the definitions, it is exempted from further Section 106 review. The definitions include exterior and interior activities such as painting on previously painted surfaces using similar color and non-destructive lead paint abatement. If the proposed activity is not exempted, there is a process stipulated for an individual state ARNG to follow for both no adverse effect and adverse effect determinations.

In June 2008, NGB completed The Historic Context for Army National Guard Readiness Centers to assist in applying National Register of Historic Places eligibility criteria to readiness centers and to serve as an overview of the different types of architecture, architects, social history, people and events that occurred throughout the United States related to readiness centers. This report can be downloaded in its entirety at this address: <https://gkoportal.ngb.army.mil/sites/ARE/C/Cultural/Historic%20Contexts%20Document%20Library/Forms/AllItems.aspx?RootFolder=%2fsites%2fARE%2fC%2fCultural%2fHistoric%20Contexts%20Document%20Library%2fNationwide%20Armor%20Historic%20Context&View=%7bE3c1372E%2d733C%2d43DC%2dBE1B%2d69BDCD311673%7d>

Contact Derek Manning at derek.manning@us.army.mil or Stephanie Webber at stephanie.webber@us.army.mil for a username and password.

The NGB is required to produce an annual report for NCSHPO and the ACHP that will include a list of projects in which the Programmatic Agreement was utilized including those activities that were exempted, have no adverse effect, and those with an adverse effect. The annual report will consist of the previous fiscal year's activities.

One unique element of this nationwide PA is that each individual state ARNG was required to organize a consultation meeting with the appropriate SHPO within 90 days of the execution of the PA. During that meeting, a state ARNG representative and the

SHPO were to determine whether to implement the alternative process as outlined in the PA to meet Section 106 responsibilities. Within 120 days of signing the PA, the individual state ARNG would formally notify the NGB in writing of the decision made during this consultation. This time requirement does not prevent individual state ARNGs and SHPOs from reconsidering this approach and the PA's implementation within their respective states in the future.

As of July 2011, the following 20 individual state ARNGs and SHPOs have elected to implement the PA:

- Alabama
- Alaska
- Arkansas
- California
- Georgia
- Indiana
- Iowa
- Kansas
- Kentucky
- Louisiana
- Missouri
- New Hampshire
- New Mexico
- Nevada
- North Carolina
- Oklahoma
- Rhode Island
- South Carolina
- Vermont
- Utah

The PA will expire in December 2020. The NGB, NCSHPO, and the ACHP will meet six months prior to the expiration of the PA to ascertain if renewal and/or revision are needed to this program alternative.

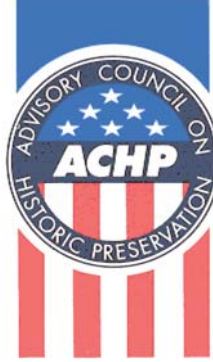
Consulting parties for this undertaking included the following: NCSHPO, the National Park Service, the Department of the Army, the National Trust for Historic Preservation, and cultural resources experts in academia.

For more information: The PA is on the ACHP Web site at www.achp.gov/palist.html



Preserving America's Heritage

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Preserving America's Heritage

**PROGRAM COMMENT FOR
WORLD WAR II AND COLD WAR ERA (1939 – 1974)
ARMY AMMUNITION PRODUCTION FACILITIES AND PLANTS**

I. Introduction

This Program Comment provides the Department of the Army (Army) with an alternative way to comply with its responsibilities under Section 106 of the National Historic Preservation Act with regard to the effect of the following management actions on World War II (WWII) and Cold War Era Army Ammunition Production Facilities and Plants that may be eligible for listing on the National Register of Historic Places (Facilities and Plants): ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.

In order to take into account the effects on Facilities and Plants, the Army will conduct documentation in accordance with The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation.

II. Treatment of Properties

A. Army Mitigation

1. The Army has an existing context study, Historic Context for the World War II Ordnance Department's Government-Owned Contractor-Operated (GOCO) Industrial Facilities 1939-1945 as well as documentation of nine World War II GOCO Plants.

2. The Army will prepare a supplemental volume that revises and expands the existing context to include the Cold War Era (1946-1974). The updated context study will:

focus on the changes that the plants underwent to address changing weapons technology and defense needs; and

identify prominent architect-engineer firms that may have designed architecturally significant buildings for Army Ammunition Plants.

3. The Army will prepare documentation that generally comports with the appropriate HABS/HAER standards for documentation for selected architecturally significant Facilities and Plants at two installations. This documentation will be similar to and follow the format of the existing documentation described in section II.A.1, above.

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4. Upon completion of the documentation, the Army will then make the existing documentation of the nine WWII GOCO Army Ammunition Plants and the WWII GOCO context and the new documentation, to the extent possible under security concerns, available in electronic format to Federal and State agencies that request it.

5. In addition, as a result of on-going consultations with stakeholders, the Army will provide a list of properties covered by the Program Comment, by state, to the National Conference of State Historic Preservation Officers and the Advisory Council on Historic Preservation.

6. The Army will also develop additional public information on the Army ammunition process, from production through storage, to include:

a display that can be loaned to one of the Army's museums, such as the Ordnance Museum at Aberdeen Proving Ground, or used at conferences; and

a popular publication on the ammunition process to accompany the display.

Copies of this information will be available electronically, to the extent possible under security concerns, and hard copies will be placed in a permanent repository, such as the Center for Military History.

7. The Army will encourage adaptive reuse of the properties as well as the use of historic tax credits by private developers under lease arrangements. The Army should also incorporate adaptive reuse and preservation principles into master planning documents and activities.

The above actions satisfy the Army's requirement to take into account the effects of the following management actions on Facilities and Plants: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance activities, new construction, demolition, deconstruction and salvage, remedial activities, and transfer, sale, lease and/or closure of such facilities.

III. Applicability

A. This Program Comment applies solely to Facilities and Plants. The Program Comment does not apply to the following properties that are listed, or eligible for listing, on the National Register of Historic Places: (1) archeological properties, (2) properties of traditional religious and cultural significance to federally recognized Indian tribes or Native Hawaiian organizations, and/or (3) Facilities and Plants listed or eligible National Register of Historic Places districts where the ammunition production facility is a contributing element of the district and the proposed undertaking has a potential to adversely affect such historic district. This third exclusion does not apply to ammunition production related historic districts that are entirely within the boundaries of an ammunition production plant. In those cases the Program Comment would be applicable to such districts.

B. An installation with an existing Section 106 agreement document that addresses Facilities and Plants can choose to:

1. continue to follow the stipulations in the existing agreement document for the remaining period of the agreement; or

2. seek to amend the existing agreement document to incorporate, in whole or in part, the terms of this Program Comment; or

3. terminate the existing agreement document and re-initiate consultation informed by this Program Comment, if necessary.

C. All future Section 106 agreement documents developed by Army installations related to undertakings and properties addressed in this Program Comment shall include appropriate provisions detailing whether and how the terms of the Program Comment apply to such undertakings.

IV. Completion Schedule

On or before 60 days following issuance of the Program Comment, the Army and ACHP will establish a schedule for completion of the treatments outlined above.

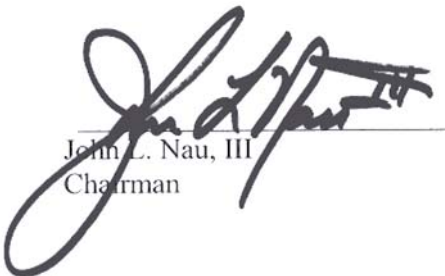
V. Effect of the Program Comment

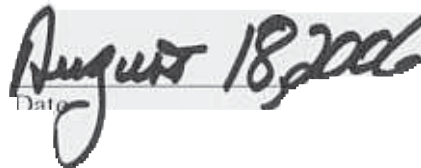
By following this Program Comment, the Army has met its responsibilities for compliance under Section 106 regarding the effect of the following management actions on WWII and Cold War Era Army Ammunition Production Facilities and Plants that may be eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities. Accordingly, the Army will no longer be required to follow the case-by-case Section 106 review process for such effects.

VI. Duration and Review of the Program Comment

This Program Comment will remain in effect until such time as Headquarters, Department of the Army determines that such comments are no longer needed and notifies ACHP in writing, or ACHP withdraws the comments in accordance with 36 CFR § 800.14(e)(6). Following such withdrawal, the Army would be required to comply with the requirements of 36 CFR §§ 800.3 through 800.7 regarding the effects under this Program Comments' scope.

Headquarters, Department of the Army and ACHP will review the implementation of the Program Comment seven years after its issuance and determine whether to take action to terminate the Program Comment as detailed in the preceding paragraph.


John L. Nau, III
Chairman


Date

APPENDIX J

CULTURAL RESOURCES MANAGER'S GUIDANCE

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Cultural Resources Manager's Guidance

This appendix provides guidance and procedures for the CRM to implement the ICRMP and meet cultural resources compliance requirements. This chapter is presented in three sections. The first section provides overarching guidance and procedures that implement the ICRMP and achieve ICRMP objectives program-wide. The second section provides guidance for project-specific or resource-specific tasks and actions. These sections also provide timelines for completing these tasks. The third section provides references and information sources that the CRM might find useful or that have been referenced throughout the text.

The HIARNG is capable of implementing this ICRMP Update and fulfilling projects in Chapter 2. However, implementation of this ICRMP Update is no guarantee that funds will be available. Unfunded work might have to be scheduled for later years.

The Army designated a percentage of environmental funding to NGB to support state ARNG federal requirements. Though funds are not fenced specifically for cultural resource projects, state cultural resource projects requested through the STEP funding request process are rolled into the amount request from Army by NGB. The DA allotted amount is then distributed by NGB according to the state's listed priority for cultural resources projects supporting federal missions. Some discretion is allowed by the TAG at the state level to account for short-term mission priority changes. Some projects are paid for by the proponent such as ITAM. The STEP Project Catalog for cultural resources projects is provided in **Appendix K**. The STEP policy and guidance can be used for estimating cultural resources projects.

J.1 Program-Wide Guidance

This section provides guidance and procedures for ongoing and program-wide cultural resource management. Project-specific guidance is provided in section J.2.

J.1.1 Cultural Resources Manager Annual Review & Update of ICRMP

The CRM is responsible for the various updates to maintain a current cultural resource management program. **Table J-1** lists the reports and due dates.

Table J-1. Cultural Resources Reporting and Review Requirements.

Activity Requirement	Date Due
ICRMP Annual Review & Update	On anniversary of signing of the 2016-2021 ICRMP Update
Army Environmental Database – Environmental Quality (AEDB-EQ)	Quarterly, or as data calls come through to NGB
Input projects into STEP Tool	Once each year (~1 March – 30 April)
Update PRIDE database	On anniversary of signing of the 2016-2021 ICRMP Update, as well as after each new inventory or evaluation effort is completed and SHPD has concurred with eligibility determinations

ICRMP Annual Review & Internal Update

In accordance with AR200-1, the annual report on the status of implementing the ICRMP over the previous year is required. The purpose of the Annual Report is to provide NGB a progress report on implementation of the CRM program and ICRMP. A guide for the Annual Report is provided in **Appendix G**. Per NGB's Draft ICRMP Implementation Guidance, the Annual Report should include the following elements:

- Compare stated mission, goals, and objectives in ICRMP with current mission, goals, and objectives, focusing on expected changes to impacts on cultural resources.
- Review the status of cultural resources and Master Planning projects: Past, Present and Future
- Review and update external contact information: SHPOs, NHOs, or any interested parties
- Provide a summary of highlights, key achievements, hot issues, and points of interest

NGB has outlined the following steps for CRMs to take in implementing their ICRMP or ICRMP Update once the document has been certified as legally sufficient. Draft guidance on this document is provided in **Appendix K**.

- Align project lists (see Chapter 2) with STEP Projects
- Develop Soldier Awareness Training regarding cultural resources
- Develop Maintenance and Treatment Plans for eligible buildings or historic districts
- Distribute SOPs to Internal Stakeholders (consider a training session)
- Network with other ARNG CRMs
- Update the ICRMP as needed, but annually at a minimum
- Know your resources and planned projects; identify if agreement documents would help streamline your program.

Programming and Budgeting

The STEP Tool serves as a source document in programming, budgeting, and allocating resources needed to execute the ARNG environmental program. It is used to show past accomplishments and expenditures; to indicate the status of current projects; to refine and validate requirements for the budget year; and to support planning, programming, and budgeting for the out years. The STEP Tool is used by the CRM when requirements are identified. NGB-ARE-C reviews the requirements for accuracy and validates the projects. There are approximately 13 cultural resources project "types" identified in the STEP Tool project catalog (see **Appendix K**). Projects need to be linked with operational goals and needs.

Timing: The programming and budgeting must be completed once a year (15 March – 15 July) and submitted to NGB-ARE-C.

Army Environmental Database – Environmental Quality (AEDB-EQ)

The AEDB-EQ is a World Wide Web-based data system that serves as a primary source of information for conveying the Army's environmental status to the senior Army leadership, DoD, and Congress. Its primary focus is to track Army compliance with environmental laws for multi-media reporting and management areas through inspections, enforcement actions, fines and penalties, and other program parameters on a quarterly basis. Primary reports for these data are the Quarterly Army Performance Review (to Secretary of the Army), and the semi-annual DoD Environmental Quality In Progress Review (IPR) (to Deputy Under Secretary of Defense), the fall IPR being the Army's input to the DoD AEDB-EQ to Congress (RCS 1997). In addition to the quarterly reports, the AEDB-EQ data calls in the fall and spring also include requirements for additional data required by the semi-annual DoD in IPRs and other reports that HQDA submits.

The AEDB-EQ is a process for auditing the status of the environment. It is the CRM's responsibility at the state/territory level to provide this information to NGB at a minimum on an annual basis, or as requested. The CRM completes this task in a minimum of two ways: (1) by updating PRIDE on the anniversary of the signing of the 2016-2021ICRMP Update and (2) by completing the Cultural Resources Questionnaire and submitting it to NGB (see **Appendix K**).

Army Historic Preservation Campaign Plan

The goals of the Army Historic Preservation Campaign Plan are to promote cost effective historic building management and to improve the balance between NHPA compliance and the mission of the Army. The goals are approached through Army policy and guidance actions, and through regulatory and legislative actions. The Army's existing programming and reporting mechanisms include the AEDB-EQ, integrated facilities system (IFS) into which PRIDE feeds, and the Installation Status Report (ISR). These existing programming and reporting mechanisms are used for upward reporting of resource requirements and status of various aspects of the program. The existing reporting systems are leveraged extensively for reporting on the success indicator metrics of this campaign plan. The plan can be found at www.aec.army.mil.

J.1.2 Geographic Information System and Data Management

Integrating HIARNG cultural resources management data with a statewide GIS program allows the HIARNG Cultural Resources Program to more efficiently support the HIARNG's mission of readiness. Minimally, GIS layers should be developed for historic buildings, archaeological sites, predictive archaeological models, and the location of the geographic area where NHOs have ancestral ties. Ideally, historic buildings survey data should be stored within a database that can be related to a GIS theme. GIS can facilitate application of the cultural landscape approach to cultural resource management and integration of cultural resource best management practices into installationwide planning and projects. To aid in the integration of cultural resources information into overall HIARNG installations and statewide planning and management, layers summarizing all known cultural resource sites and larger cultural landscapes, ground disturbance, and archaeological sensitivity (predictive modeling) will be developed within the GIS. Development of these layers should be based on

- Maps and reports supplied from the SHPD or NHOs
- Extant GIS information compiled (e.g., the built environment at ARNG installations)
- Existing and future cultural resource surveys and evaluations.

GIS layers and themes depicting archaeological resources and sacred sites are considered sensitive and will not be released to the general public. These layers should be password protected.

When preparing the scope of work (SOW) for contracts addressing cultural resources issues, results of cultural resources surveys and evaluations should be delivered in GIS format to include survey areas, transects, and cultural sites and properties and eligibility status. Within the SOW, reference the latest Army/NGB guidance regarding GIS file form

ts and standards, and include that all data created or modified in this contract will adhere to the Spatial Data Standards (SDS) and the Federal Geographic Data Standards (FGDC) metadata standards.

Maps should include, at a minimum, a north arrow, legend, map creator, map purpose, and creation date.

GIS themes depicting buildings and other facility types should be attributed with the appropriate keys to align with the PRIDE database. This will enable the query and display of the cultural resources information stored within PRIDE through GIS. For example, a map can be created showing whether or not a building has been evaluated, is eligible, or is listed in the NRHP, or as a national landmark; or if the building is a contributing resource to a district that is eligible or listed in the NRHP.

J.1.3 Standard Operating Procedures

SOPs have been prepared to assist HIARNG personnel who are not responsible for cultural resources management, but whose areas of responsibility could affect cultural resources. Chapter 3 includes these SOPs. SOPs should be made available to all personnel including any tenants, contractors, and occasional users. Include an overview in the orientation packet for tenants and occasional users, and include appropriate SOPs in contracts. SOPs can also be featured on the facility web site. Flow charts and procedures for inadvertent discovery can also be included in Trainers' Guides and Soldiers' Cards.

Procedures: The CRM will distribute these SOPs to all HIARNG personnel and provide guidance and training, as necessary (CRMs should complete a log documenting SOP distribution; see **Appendix F**).

J.1.4 Cultural Resources Training

Training for various staff is a prerequisite for properly implementing the ICRMP and for good stewardship of cultural resources. Many training opportunities are available for environmental staff, as well as nonenvironmental staff. Preferably the CRM shall have a basic knowledge of CRM and education in a related field, or at least a CRM introductory training certificate.

Training for CRM personnel could include laws and regulation overview, Section 106, maintenance of historic property, preservation of cultural landscapes, NAGPRA, agreement documents, tribal consultation, and curation. CRM training courses usually range from 3 to 5 days. Register and plan in advance.

For the CRM, training recommendations include

- Primary Training – Section 106, Native American consultation workshop, NGB CRM 101 class (offered every 2 years), and ICRMP workshop if available (offered every 4 or 5 years)
- Secondary Training – Agreement documents, NAGPRA, and ICRMP workshop
- Tertiary Training – Integrating GIS and cultural resources, and advanced Section 106

For environmental staff and the CRM, training opportunities include

- NGB annual workshop (topics vary) – gko/ngb.army.mil, and regional consultation workshops (two per year)
- Department of Defense (Denix) DoD Conservation Workshop (every 2 years)
- Advisory Council on Historic Preservation – www.achp.gov
- U.S. Army Corps of Engineers, Seattle District – www.nws.usace.army.mil
- National Preservation Institute – www.npi.org
- Civil Engineer Corps Officers School – www.cecos.navy.mil.

For non-environmental HIARNG personnel, training is crucial to ensure compliance with environmental laws and policies and protection of cultural resources. By interfacing with field commanders, project planners, facility managers, and TAG staff, the CRM can develop solutions and programs that blend with existing training opportunities and the HIARNG mission (see **Table 2-6**).

The CRM should provide a training program in conjunction with, and supported by, operations for training site managers, field commanders and their troops, maintenance staff, and others who might encounter cultural resources. Training subjects can include understanding SOPs in Chapter 3, introduction to cultural resources regulations and management, and identification of cultural resources. Information from the training program can be summarized and included with training site information packages for soldiers, and can be placed on bulletin boards at historic facilities as reinforcement to training. A sample training brief is included in **Appendix K**.

J.1.5 Professional Qualification Standards

ARNG CRMs typically are not trained historians, archaeologists, ethnographers, or architectural historians, but are more often individuals assigned the CRM position as a collateral duty. Although CRMs are required to undergo training, as outlined in section J.1.4, most will not reach a level of training equivalent to prevailing professional standards. Accordingly, the CRM will need to hire consultants to complete inventory and evaluation projects. To ensure that the consultants being hired have the appropriate professional qualifications, they must meet the standards used by the NPS and published in 48 FR 44716 (September 1983). The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise might be needed, depending on the complexity of the task and the nature of the historic properties involved.

J.2 Project-Specific and Resource-Specific Guidance

This section provides guidance and procedures for ongoing project-specific, and resource-specific cultural resources management.

J.2.1 Archaeological Investigations

Because the HIARNG manages land as well as buildings and structures, and conducts actions that can result in ground disturbance, the HIARNG will have requirements under Sections 106 and 110 of the NHPA to identify and evaluate archaeological resources on the land areas that it manages. The following sections outline the range of identification and evaluation investigations that could be completed by the CRM as part of the HIARNG's management of archaeological resources.

Archaeological Predictive Models

Analysis of spatial relationships of known cultural resources can assist in determination of nonrandom patterns of prehistoric land use. Predictive models where archaeological surveys have not been completed can be useful for planning purposes to determine sensitive areas and additional project needs for avoidance or mitigation, prediction of future impacts and alternative development, tribal consultation, and development of training scenarios that avoid sensitive resources. Also, archaeological surveys can be stratified to focus more (not exclusively) on high-sensitivity areas when 100 percent intensive surveying and testing is cost- or time-prohibitive.

Modeling can be completed as a separate project, or as part of the research phase of a specific archaeological survey project. Areas of high, medium, or low probability to yield sites are modeled and then tested in the field to support the model theory. The SHPD or State Archaeological Society might have existing predictive models or predictive modeling parameters such as topography, elevation, proximity to water, and vegetation types to assist with modeling HIARNG lands.

Appendix C contains a summary of previous planning level surveys and predictive models. For specific archaeological surveys, include language in task orders for use of the cultural landscape approach and existing predictive models during surveys and to include a conclusion in the report about the accuracy of the model. Areas surveyed and survey results should also be illustrated in a GIS layer.

Development of an HIARNG lands statewide predictive model will require, at a minimum, the expertise of an archaeologist and a GIS technician with tribal consultation. A simple model can be developed using the established parameters or criteria for each installation as well as plotting areas of previous disturbance. These parameters can be located on a map and predictive ratings assigned. It is recommended that a GIS layer be developed for this model. In most cases, the models will not replace the requirement for surveys, but as more data are collected about actual archaeological or cultural site distribution, these models can be tested and refined to assist with planning, reduce the level or amount of surveying, and provide a more effective use of program funding. Also, each year additional surveys on or near HIARNG property could be conducted, new discoveries could be made, and information and theories developed regarding former inhabitants and their lifeways. The GIS must be updated as new information becomes available to stay current and remain a useful manager tool. Therefore, the model will need periodic review to determine its validity and keep data current.

Archaeological Inventories and Evaluations

Inventories and evaluations are a required step for undertakings and compliance with Section 106 of the NHPA – undertakings on federal property (lands or buildings) or state property with federal actions (such as funding or permits). Results can be integrated with the NEPA process as needed but, in most cases, archaeological work must be initiated at the earliest planning phase of any project that has the potential to affect archaeological properties. Testing and excavations are more involved processes, and are generally used to further define an archaeological site and mitigate for adverse effects. For Section 106 compliance surveys, identifying the area of potential effect (APE) for a project and scoping of the survey or evaluation effort should be coordinated with the SHPD and any interested NHOs. Section 110 survey and evaluation efforts can also be coordinated with the SHPD and interested NHOs, to help identify priority areas for investigation, applicable research questions to be investigated, and methodology to be applied. Archaeological surveys must be conducted by qualified personnel, see section J.1.5.

Note: federal funding cannot be used for archaeological inventories on lands being acquired with state funds.

The following are very general definitions that apply to archaeological inventories:

Constraints analysis: A constraints analysis is completed when a party is interested in knowing what might be on a property in the most general way. A record search/literature search with sometimes a field visit for reconnaissance is conducted. A letter report is prepared to document overall impressions and concerns with recommendations, as appropriate. This type of analysis is also referred to as a reconnaissance survey, Phase Ia (eastern U.S.), or Class I (western U.S.). Check with the SHPD for levels of analysis and surveys and survey requirements.

Survey: Survey involves a record search/literature review, systematic coverage of a property, recording or updating of all discovered sites, and a report. Surveys sometimes involve some excavation depending on the level of information that is needed or state requirements. Excavation can be shovel scrapes or shovel test pits. Surveys can be collection or noncollection. Federal agencies generally prefer noncollection surveys. Collection requires cataloguing and additional maps for the sites that are complex and require curation (see section J.2.6).

Generally, a survey involves preparation of a work plan that describes how the work will be done and by whom. The survey interval is generally between 5 to 20 meters between team members and depends on terrain, vegetation coverage, and resources types. All sites located during a survey have to be recorded and mapped. A general assessment of the kind of site it is and perhaps the overall potential of the site can be suggested after a survey.

The survey report provides an environmental setting, culture history, a description of the site, methodologies, research questions, survey results, recommendations, and any additional state requirements. All discovered sites are treated as eligible for listing on the NRHP until determination of eligibility is final (see evaluation below). Recommendations are crafted based on a proposed project or action. If there are no immediate plans for a property, recommendations might include avoiding the site. These surveys are often referred to also as Phase I and Phase II. Check with the SHPD for levels of surveys and survey requirements.

Evaluation: Evaluation or testing of sites is extremely variable. There are guidelines for sparse lithic scatters that allow this type of site to be addressed in an expedient manner; however, for other site types there are a number of approaches. Many tests involve shovel test pits, shovel scrapes, drill holes, and sample excavation units with surface mapping, collection, and special studies. The number of units will vary greatly depending on the size of the site and how many units will be necessary to analyze the sections of the site that are not subjected to units, gather information to address research questions, and make conclusions about the site.

Upon completion of excavation, a report is prepared to summarize the testing and make a recommendation of eligibility.

Data Recovery: If a historic property will be impacted by an action or undertaking, there must be mitigation, and data recovery is a form of mitigation for archaeological sites. Data recovery requires preparation of an action/work plan, which describes the site, what information is hoped to be gained by the data recovery, study questions, sample design, catalog methods, special studies, and report preparation. This plan is carefully reviewed by the SHPD or state archaeologist and NHOs prior to field efforts. Data recovery efforts vary greatly in size and scope. The approach to a data recovery depends greatly on the site, geographic location, type of project, archaeologist, and timing. All collected items from federal land must be curated in a federally approved facility.

Procedures: Ensure that the scope of work clearly defines the type of survey or excavation; federal and state regulations to be met; the project objectives; a description of the deliverables, including GIS; and qualifications for those performing the work.

Determine if permits are necessary. Stakeholders include NHOs.

Archaeological Permits

In some instances, archaeological investigations may require federal or state permits. The most common categories of permits are described below.

Archaeological Resources Protection Act Permits. ARPA permits are required when the following three criteria are met:

- The project is on federal land
- Digging or collection of artifacts will occur
- The participants are not directly contracted to or by the HIARNG.

ARPA permits for archaeological investigations that could result in the excavation or removal of American Indian human remains and other cultural items as defined in NAGPRA, or in the excavation of archaeological resources that are of religious or cultural importance to NHOs, will be issued in accordance with AR 405-80 and AR 200-1. The HIARNG supporting U.S. Army Corps of Engineers (USACE) District Real Estate Office will issue the permit after the HIARNG Commander conducts consultation in accordance with 43 CFR 10.5 and 32 CFR 229.7 with the culturally affiliated NHOs. The HIARNG Commander provides the USACE district with approval to issue the permit by means of a report of availability prepared after necessary consultation and compliance actions have been met. ARPA permits shall provide for the disposition of NAGPRA cultural items in accordance with NAGPRA

subsections 3(a) and 3(b) and 43 CFR 10. The HIARNG Commander will ensure that documentation of consultation with culturally affiliated NHOs are prepared and maintained as part of the record of each such permit.

The HIARNG will ensure that ARPA permits:

1. Comply with the requirements of 32 CFR 229, 43 CFR 10
2. Require that any interests that NHOs have in the permitted activity are addressed in a manner consistent with the requirements of the NHPA and NAGPRA prior to issuance of the permit
3. Require that permitted activities be performed according to applicable professional standards of the Secretary of the Interior
4. Require that the excavated archaeological artifact collection and associated records are permanently curated in a curation facility that meets the requirements of 36 CFR 79

Archaeological resources, objects of antiquity, and significant scientific data from federal installations belong to the installations, except where NAGPRA requires repatriation to a lineal descendant, federally recognized tribe, or Native Hawaiian organization. Archaeological resources, objects of antiquity, and significant scientific data from nonfederal land belong to the state, territory, or landowner. Such resources from lands used by the HIARNG, but for which fee title is held by another agency, are the property of the agency designated as the land manager in the land-use instrument (e.g., public land order, special use permit). HIARNG Commanders should ensure that land use instruments allowing for military use are reviewed to determine proper roles and responsibilities.

HIARNG staff or contractors carrying out official duties associated with the management of archaeological resources who meet the professional qualifications and whose investigations meet the requirements of 32 CFR 229.8 are not required to obtain a permit under ARPA or the Antiquities Act for the investigation of archaeological resources on a federally owned or controlled installation, including situations where cultural items as defined by NAGPRA could be excavated.

However, in situations where NAGPRA cultural items or NHPA historic properties could be encountered during intentional excavation of archaeological resources, the requirements of NAGPRA and 43 CFR 10, and NHPA and 36 CFR 800 must be met prior to such archaeological excavations.

For the purposes of HIARNG compliance with ARPA, the HIARNG Commander is considered the federal land manager as defined in 32 CFR 229.3(c). As the federal land manager, the HIARNG Commander may determine that certain archaeological resources in specified areas under his jurisdiction, and under specific circumstances, are not or are no longer of archaeological interest and are not considered archaeological resources for the purposes of ARPA (in accordance with 32 CFR 229.3(a)(5)). All such determinations shall be justified and documented by memorandum and shall be formally staffed for review through the NGB to HQDA prior to final determination. HQDA uses technical and legal guidance from AEC to review the draft document.

The HIARNG Commander will ensure that military police; installation legal staff; the installation PAO; and the fish, game, and recreation management staff are familiar with the requirements and applicable civil and criminal penalties under ARPA. Also in accordance with ARPA Section 9, the HIARNG Commander may withhold information concerning the nature and location of archaeological resources

from the public under Subchapter II of Chapter 5 of Title 5 of the *United States Code* or under any other provision of law. ARPA permits can take up to 6 months to acquire.

J.2.2 Inadvertent Discoveries

Inadvertent Discovery of Human Remains or Funerary Objects – Native American Graves Protection and Repatriation Act

In the event of discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony, the CRM will ensure that all appropriate measures are implemented to protect the remains and any other protected cultural items; all appropriate NHOs and agencies will be promptly notified of the find, and all applicable federal, tribal, and state procedures will be followed.

For ground-disturbing activities, project planners, engineers, soldiers, tenants, and construction personnel should be informed of types of cultural resources potentially existing at the HIARNG site or training installation, and they should be briefed on the provisions in SOP 5.

Prior to field troops, construction crews, or non-HIARNG personnel commencing activities at any HIARNG property, they should be briefed on the following procedures (flowchart provided in **Figure J-1**).

1. Ensure that activities have ceased at the discovery site and that the site has been secured from human and natural forces.
2. Notify the SHPD of the discovery. This notification should be by telephone, to be followed immediately by written notification.
3. If human remains are known or suspected to be present, also promptly notify the state police and medical examiner, and if federal property, the FBI. Notify the HIARNG JAG, operations manager in the Directorate of Operations (DSCOPs), and PAO.
4. Visit the location of the discovery within 24 hours of the find. The services of appropriate technical experts (e.g., archaeologists, specialists in human osteology, forensic anthropologists) may be retained to participate in the field visit.
5. If the CRM has reason to believe that American Indian human remains, funerary objects, sacred objects, or objects of cultural patrimony have been discovered, the CRM must provide immediate telephone notification of the discovery, along with written notification by certified mail, to NGB.
6. If known, as much information as possible concerning the cultural resource (such as type, date, location, any indicators of ethnicity, and circumstances of the discovery) should be provided to NGB. NGB, in consultation with the HIARNG and appropriate interested parties, will determine the significance and origin of the remains.
7. The CRM will obtain certification of notification from NGB. NHOs would be notified by telephone with written confirmation within 3 days after certification. This notification must include pertinent information as to kinds of human remains, funerary objects, sacred objects, or objects of cultural patrimony, their condition, and the circumstances of discovery.
8. The CRM will follow NAGPRA procedures and consult with interested parties (SHPD, NHOs, property owner) to discuss disposition of remains and mitigation measures. The CRM, in consultation with the SHPD and NHOs, as appropriate, will determine the procedures for

disposition and control of any Native Hawaiian cultural items excavated or removed as a result of inadvertent discoveries.

Activities in the area of discovery will resume 30 days after certification of notification is received, or sooner, if a signed binding agreement is reached. Keep the PAO informed throughout the process. Phone numbers and the names of contacts are provided in **Appendix F**. Before the original action can resume, NGB must approve that the NAGPRA process has been implemented properly and that the HIARNG is in a legal position to proceed with the project in the area of discovery

One management tool is for the HIARNG to develop a CA prior to the encounter of a burial to agree upon procedures and streamline the process.

Burial Treatment Plan

If human skeletal remains are discovered at a HIARNG installation, stop all activities that might disturb the remains, including excavation and foot traffic within a 10-m radius. Secure the area containing human skeletal remains and notify the CRM that human skeletal remains have been encountered. The CRM will report to SHPD and County police. If remains are less than 50 years old, they fall under the jurisdiction of the police. If remains are over 50 years old the fall under the Burial Sites Program and HIARNG will consult with the SHPD and Island Burial Council, NHOs, and external stakeholders. A qualified human osteologist will be needed to verify the remains are human and age (over/under 50 years old).

The human skeletal remains are to be left in-situ and not moved unless endangered. In situ remains will be covered with a thin layer of loose soil and/or fabric or plywood to protect them from public view and from possible human or environmental disturbance (e.g., wind, rain, and direct sunlight). The immediate area (up to 10-m beyond the find) will be flagged with bright, highly visible flagging tape, and all construction crew members will be notified as to the find. Additional protective and security measures may be required depending on the visibility of the burial site. In no event shall human skeletal remains be removed from the burial site unless endangered and/or until consultation with SHPD, Island Burial Council, NHOs, and external stakeholders has concluded.

Minimal archaeological treatment of human skeletal remains (whether in situ or not) may include (1) verification of the context in which they are found and (2) on-site visual inspection of possible indicators of age, sex, health, and other information (e.g., condition) may be obtained without disturbing the remains. The skeletal remains will not be cleaned, photographed, or subjected to laboratory analysis, including metric analysis or other invasive study (e.g., DNA).

If in situ or otherwise undisturbed burial features are encountered, a plan map will be prepared for features visible in a horizontal exposure (i.e., in plan view). Profile drawings will be completed for burials features exposed in unit faces. All burial features will be GPS-plotted in compliance with the HIARNG geospatial data standards. Digital photographs will be taken of the surrounding area, but human skeletal remains will not be photographed at any time. Photo lists and a sequentially numbered field catalog of collected materials will be maintained.

HIARNG will consult with the Island Burial Council, NHOs, and external stakeholders to reinter the remains.

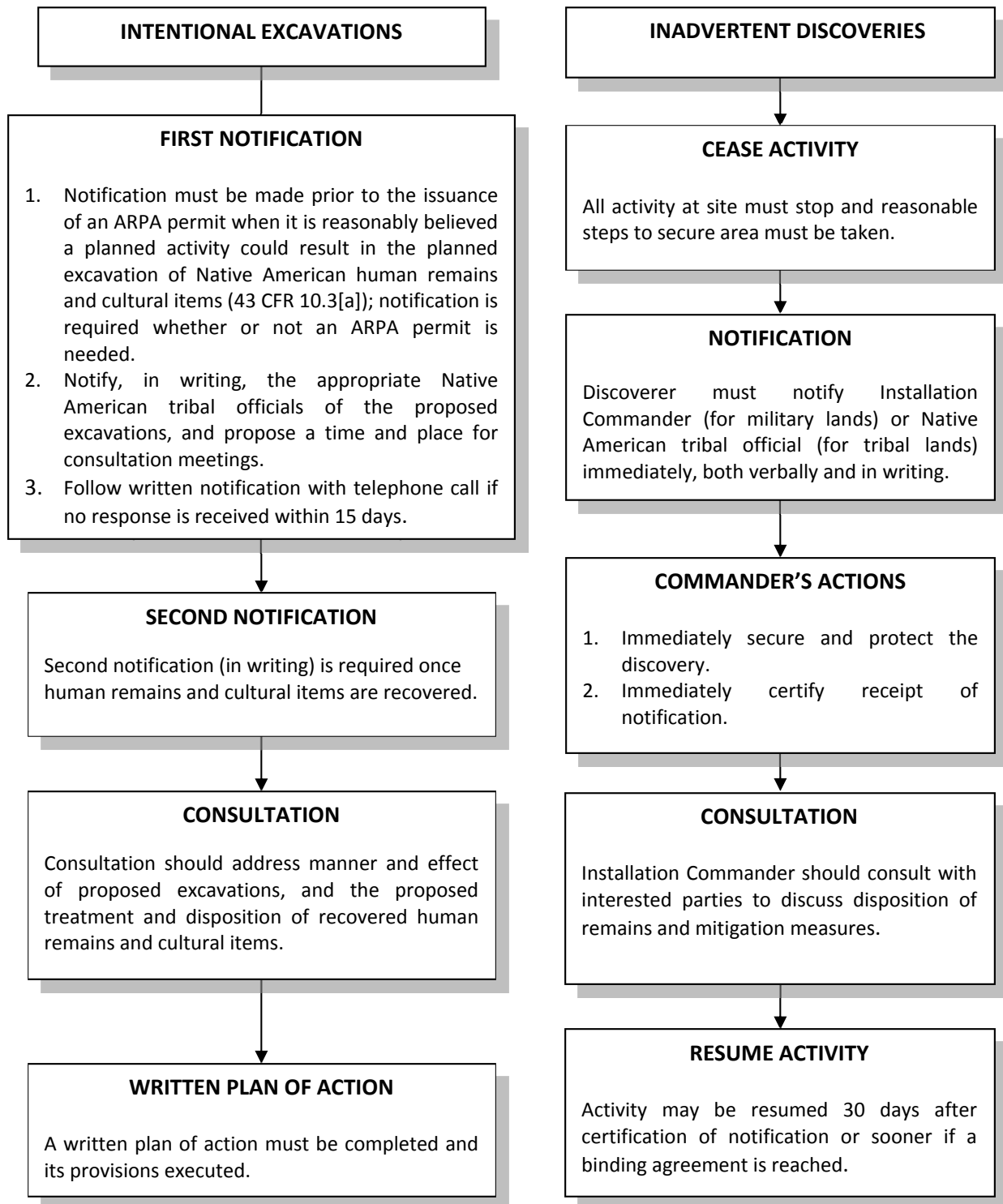


Figure J-1. Policies for Archaeological Excavation under Native American Graves Protection and Repatriation Act 25 USC 3001-3013.

Inadvertent Discovery of Archaeological Artifacts

The CRM shall ensure that, in the event of the inadvertent discovery of archaeological resources (excluding items covered under NAGPRA), measures are taken promptly to protect the find from disturbance, assess the significance of the discovery, and implement appropriate mitigative measures for significant resources.

1. Ensure that activities have ceased at the discovery site, and that the site has been secured from human and natural forces.
2. The CRM will promptly notify the SHPD of the discovery.
3. Begin recording the site if the site can be avoided.
4. Prepare full documentation of the resource and a report summarizing the results of the investigation. This documentation and the report will be submitted to the SHPD and NHOs.

5. J.2.3 Curation

6. *[Note: AR 200-1, 2-7 (a) and (b) – The installation commander will ensure that all collections are possessed, maintained, and curated in accordance with the requirements of 36 CFR 79. Generally, installations should not establish archaeological curation facilities on the installation due to the permanent recurring costs and personnel requirements to maintain such repositories to the minimum standards in 36 CFR 79 in perpetuity].*
7. In accordance with the requirements of 36 CFR 79, *Curation of Federally Owned and Administered Archaeological Collections*, AR 200-1 requires TAG of the ARNG to ensure that all archaeological collections and associated records, as defined in 36 CFR 79.4(a), are processed, maintained, and preserved.
8. Collections are material remains that are excavated or removed during a survey, excavation, or other study of a prehistoric or historic resource, and associated records that are prepared or assembled in connection with the survey, excavation, or other study (36 CFR 79.4[a]).
9. Associated records are original records (or copies thereof) that are prepared or assembled, that document efforts to locate, evaluate, record, study, preserve, or recover a prehistoric or historic resource (36 CFR 79.4([2])).
10. The CRM should consider long-term and the ongoing cost of permanent collection curation and include this in the budgets for archaeological investigation projects in STEP.
11. Collections from federal lands should be deposited in a repository that meets the standards outlined in 36 CFR 79, to ensure that they will be safeguarded and permanently curated in accordance with federal guidelines. Collections from state owned property that have title vested in the HIARNG should be curated in facilities that meet the requirements of the SHPD.
12. A curation facility is specifically designed to serve as a physical repository where collections and records are sorted, repackaged, assessed for conservation needs, and then placed in an appropriate, environmentally controlled, secure storage area. Proper curation also includes a review and update of all paper records. An important component of artifact curation is the

selection of artifacts for site-specific reference collections. Artifact data are entered into a database, which is an important management and research tool. The overall goal of the federal curation program, as set forth in 36 CFR 79, is to ensure the preservation and accessibility of cultural resource collections and documents for use by members of the public interested in the archaeology and history of the region

13. Procedures:

- Before permanent curation, all artifacts recovered on HIARNG sites and training installations will be analyzed using commonly accepted methods for artifacts in the region. Artifact analyses will be consistent with current archaeological research objectives for the region.
- Cleaning, curation, and storage of artifacts and associated documents will meet professional standards.
- Artifacts and associated documents will be stored in clean, spacious, temperature-controlled facilities while on the installation and kept in archival-quality bags, folders, or boxes.
- The HIARNG may choose to negotiate a memorandum of understanding (MOU) or similar agreement with the SHPD or other state repository, museum, or university; or other approved curation facility for final curation of all artifacts.
- All field, laboratory, and other project records will be reproduced on archival-quality paper.

14. 36 CFR 79 Reporting and Inspection Requirements

15. The annual Secretary of the Interior's report to Congress requires an assessment of archaeological records and materials in federal repositories.
16. The CRM shall determine, on an annual basis, the volume of records and materials held by the HIARNG installation or curated on its behalf at a curation facility.
17. Inspections of federally curated archaeological collections shall be conducted periodically in accordance with the Federal Property and Administrative Services Act (40 U.S.C. 484), and its implementing regulation (41 CFR 101). Consistent with 36 CFR 79.11(a), the CRM shall
- Maintain a list of any U.S. Government-owned personal property (i.e., artifacts, documents, as defined in 36 CFR 79) received by the CRM
 - Periodically inspect the physical environment in which all archaeological materials are stored for the purpose of monitoring the physical security and environmental control measures
 - Periodically inspect the collections in storage for the purposes of assessing the condition of the material remains and associated records, and of monitoring those remains and records for possible deterioration and damage
 - Periodically inventory the collection by accession, lot, or catalog record for the purpose of verifying the location of the material remains and associated records

- Periodically inventory any other U.S. Government-owned personal property in the possession of the CRM.

J.2.4 Records Management

The proper management of official records is Army policy and typically a mandated function of the HIARNG historian, if one has been assigned. It is important that the CRM be cognizant of Army records management programs, though, because the custodianship of historical records can fall to the CRM or an associated office. Also, the CRM holds unique cultural resources-related records that are not represented in other facets of the installation. The preservation of these records is important.

Due to the fact that the HIARNG is in the unique position of having both state and federally mandated roles, the management of both state and federal records is discussed below.

Federal Records

Army records management policy is set forth in various documents. Secretary of the Army Memorandum of 22 February 2005: *Preservation of Army Records* states that “[o]fficial records of the US Army are of enduring significance for ensuring complete, accurate, and objective accounting of the Army’s activities” and “all elements of the US Army must ensure that official records of both peacetime and wartime activities are preserved.” Moreover, the preservation of agency records and their management is stipulated in federal regulations in 44 U.S.C. chapters 21, 29, 31, 33, and 101.

Records management requirements are delineated in AR 25-1, *Army Knowledge Management and Information Technology*, and AR 25-400-2; the Army Records Information Management System (ARIMS). A Web site dedicated to ARIMS is located at: <https://www.arims.army.mil/arimsnet/site/aersmain.aspx>. There are three avenues through which the HIARNG CRM can ensure the protection of important records.

First, if an installation records officer exists, the HIARNG should contact this individual to develop a records management program for the records generated and stored by his/her office and make sure that the cultural resources program records are managed in such a way that they comply with installation and Army policy.

Second, there are a variety of other sources for guidance if an installation records officer does not exist. Within the Army these include the Army Records Management and Declassification Agency (RMDA) whose mission is to provide oversight and program management for the Army’s Records Management Program, along with establishing programs for records collection and operating and sustaining the Army electronic archives.

The Records Management and Declassification Agency can be contacted at rmda@rmda.belvoir.army.mil. The division’s Web site can be accessed at: <https://www.rmda.belvoir.army.mil/rmdaxml/>. The Army records officer will be able to provide direction on the management of HIARNG records. Contact information is

Department of Defense
Department of the Army
Army Records Management Division
ATTN: AHRC-PDD-R
Casey Building, Room 102
7701 Telegraph Road
Alexandria, VA22315-3860

Third, the National Archives and Records Administration has a very active program in which they assist agencies in developing record management programs that help to ensure the conservation and eventual archiving of important records while considering mission needs and other circumstances. The HIARNG CRM can contact the College Park, Maryland, branch of the National Archives and Records Administration to assist in the appraisal and management of the HIARNG records under his/her control.

State Records

State records fall into two categories, those that are maintained by the HIARNG historian and those that are transferred to the State Archives. The HIARNG historian can provide guidance on what types of records are archived by each agency. The state's records management statutes are codified in HAR Title 3 Department of Accounting and General Services Chapter 20, Rules Governing the Public Use of the State Archives and Records Center and the Schedule of Fees for Special Services. The state program is similar to the federal program, but applies to state records. The State Archives provide technical assistance to agencies so that they can meet legal, fiscal, and administrative functions for records retention.

J.2.5 Historic Structures

A building is created principally to shelter any form of human activity. "Building" can also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn. Buildings eligible for the NRHP must include all of their basic structural elements. Parts of buildings, such as interiors, facades, or wings, are not eligible independent of the rest of the existing building. The whole building must be considered, and its significant features must be identified.

The term "structure" is used to distinguish those constructions created for functions other than human shelter. Structures nominated to the NRHP must include all of the extant basic structural elements. Parts of structures cannot be considered eligible if the whole structure remains. For example, a truss bridge is composed of the metal or wooden truss, the abutments, and supporting piers, all of which, if extant, must be included when considering the property for eligibility.

Buildings and structures of historic age, which is considered to be 50 years or older, should be inventoried and evaluated. An inventory is generally a physical documentation of the building that includes construction date, original and current function, a physical description of the building or structure and its current condition, and description of changes over time. The evaluation is to determine the significance of the building or structure and if it is eligible for listing in the NRHP. Generally, the inventory and evaluation are conducted concurrently.

Evaluations are conducted using NRHP criteria, as listed in 36 CFR 60.4. To be listed in, or considered eligible for, the NRHP, a cultural resource must meet at least one of the four following criteria:

- The resource is associated with events that have made a significant contribution to the broad pattern of history (Criterion A)
- The resource is associated with the lives of people significant in the past (Criterion B)
- The resource embodies distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic value; or represents a significant and distinguishable entity whose components might lack individual distinction (Criterion C)
- The resource has yielded, or might be likely to yield, information important in prehistory or history (Criterion D).

In addition to meeting at least one of the above criteria, a cultural resource must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. **Integrity** is defined as the authenticity of a property's historic identity, as evidenced by the survival of physical characteristics it possessed in the past and its capacity to convey information about a culture or group of people, a historic pattern, or a specific type of architectural or engineering design or technology.

Location refers to the place where an event occurred or a property was originally built. Design considers elements such as plan, form, and style of a property. Setting is the physical environment of the property. Materials refer to the physical elements used to construct the property. Workmanship refers to the craftsmanship of the creators of a property. Feeling is the ability of the property to convey its historic time and place. Association refers to the link between the property and a historically significant event or person.

Certain kinds of properties are not usually considered for listing in the NRHP, including

- Religious properties (Criterion Consideration A)
- Moved properties (Criterion Consideration B)
- Birthplaces or graves (Criterion Consideration C)
- Cemeteries (Criterion Consideration D)
- Reconstructed properties (Criterion Consideration E)
- Commemorative properties (Criterion Consideration F)
- Properties that have achieved significance within the past 50 years (Criterion Consideration G).

These properties can be eligible for listing only if they meet special requirements, called Criteria Considerations (see above). A property must meet one or more of the four Criteria for Evaluation (A through D) and also possess integrity of materials and design before it can be considered under the various Criteria Considerations.

Historic Districts. Sites or structures that might not be considered individually significant could be considered eligible for listing on the NRHP as part of a historic district. According to the NRHP, a historic

district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects that are historically or aesthetically united by plan or physical development.

A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. For example, a district can reflect one principal activity, such as a mill or a ranch, or it can encompass several interrelated activities, such as an area that includes industrial, residential, or commercial buildings, sites, structures, or objects. A district can also be a grouping of archaeological sites related primarily by their common components; these types of districts often will not visually represent a specific historic environment.

A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It can even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.

A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity. In archaeological districts, the primary factor to be considered is the effect of any disturbances on the information potential of the district as a whole.

A district must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects; or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management, or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.

Department of Defense Historic Status Codes

In 2005, in response to the requirements of EO 13327, DoD introduced the Historic Status Codes used to identify real property assets on the NRHP or facilities that should be evaluated for NRHP eligibility. This list was subsequently updated in 2007. **Table J-3** provides a list and explanation of the DoD Historic Status Codes.

Table J-3. DoD Historic Status Codes.

Code	Title	Definition
NHLI	Individual National Historic Landmark	An individual facility that is individually listed on the NRHP and has been further declared and NHL by the Secretary of the Interior due to its prominent importance in our Nation's history. The designation of an NHL is coordinated by the Secretary of the Interior in consultation with the Federal Preservation Officer (FPO).
NRLI	Individual National Register Listed	An individual facility that has been determined to meet the National Register criteria of eligibility, and has been formally listed in the NRHP by the Keeper of the National Register. The formal evaluation and nomination process of individual facilities involves the review, approval, and signature of the FPO, SHPD, or THPO (as appropriate), and the Keeper of the National Register.
NREI	National Register Eligible - Individual	A facility that is determined to meet the National Register criteria of eligibility but that has not gone through the formal nomination process. An eligible facility is treated the same as a facility listed in the NRHP pursuant to the NHPA and 36 CFR 800 "Protection of Historic Properties." Facilities are determined to be eligible for listing in the NRHP through installation determinations as concurred with by the SHPD or THPO (as appropriate), or by a formal determination of eligibility from the Keeper of the National Register.
NCE	Non-Contributing Element of NHL/NRL/NRE District	Facilities within the designated boundaries of a National Historic Landmark District or NRHP listed or eligible District that have been evaluated and determined not to contribute to the historic or architectural significance of the District.
DNE	Determined Not Eligible for Listing	A facility that has been evaluated using the National Register criteria and is determined not to meet any of the requirements for eligibility. This determination is carried out by the installation staff in consultation with the SHPD or THPO (as appropriate).
NEV	Not Yet Evaluated	A facility that has not yet been evaluated for historic status.
DNR*	NHLI/NHLC/NREI/NREC National Register Property – Designation rescinded	A facility formerly classified as NHLI/NHLC/NREI/NREC that has been determined by the Keeper of the National Register to lack sufficient integrity to maintain its eligibility as a historic property. The formal removal process of NREI/NREC properties involves the review, approval, and signature of the FPO, SHPD, or THPO (as appropriate), and the Secretary of the Interior.
NHLC	National Historic Landmark District – Contributing element	An individual facility that is identified as a contributing element of a District listed in the NRHP and also designated an NHL District by the Secretary of the Interior. The designation of an NHL is coordinated by the Secretary of the Interior in consultation with the FPO.

Code	Title	Definition
NRLC	National Register Listed District – Contributing element	An individual facility that is identified as a contributing element of a District formally listed in the NRHP. The formal evaluation and nomination process of contributing elements involves the review, approval, and signature of the FPO, the SHPD, or THPO (as appropriate); and the Keeper of the National Register.
NREC	National Register Eligible District – Contributing Element	An individual facility that is identified as a contributing element of a larger District determined eligible for listing in the NRHP. An eligible District is treated the same as a District listed on the NRHP, pursuant to the NHPA and 36 CFR 800 “Protection of Historic Properties.” The evaluation of contributing elements is carried out by the installation in consultation with the SHPD or THPO (as appropriate), or by an official determination of eligibility from the Keeper of the National Register.
ELPA*	Eligible for the purposes of a Program Alternative	An individual facility that is treated as eligible for listing in the NRHP by consensus of the FPO, SHPD, or THPO (as appropriate); and the ACHP during development of a Program Alternative (Comment) as defined in 36 CFR 800 “Protection of Historic Properties,” section 14: “Federal Agency Program Alternatives.” An example includes all Capehart-Wherry housing, determined eligible for the purposes of a 2002 Program Comment process.

**NOTE: The codes DNR and ELPA are reserved for NGB Headquarters use only.*

Maintenance and Care of Historic Buildings and Structures

Under Section 106 of the NHPA (see **Appendix I**), the following actions have the potential to have an adverse effect on buildings and structures that are eligible for or listed in the NRHP:

- Operations and maintenance
- Renovations and upgrades
- Demolition or replacement, or relocation
- Property lease, transfer, or sale.

This requirement applies to undertakings on federal property (lands or buildings) or state property with federal actions (such as funding or permits). Actions on state property (i.e., readiness centers [armories]) with no federal component do not require NHPA compliance; however, check state and local laws (**Appendix I**).

Upon being advised by the project proponent of proposed operations or maintenance activities, renovations or upgrades, demolition, transfer, replacement, relocation, or sale or lease of property that might affect a property which is 45 years old or older and has an undetermined historic status, the CRM must determine its eligibility for the NRHP. If the property is determined eligible, the project represents an undertaking that has the potential to effect historic properties and must be reviewed under Section 106 of the NHPA. CRMs must also review projects involving ground disturbance (landscaping, utility

excavations, building demolition or construction) to determine the potential for the project to affect archaeological sites.

The following maintenance and repair activities, when conducted as part of a federal undertaking, are determined to have no adverse effect on historic properties and, under the Nationwide Readiness Center PA (currently in Draft), will be exempted from further Section 106 review. **It must be remembered that use of this exemption list does not negate the need for the CRM to review project to determine whether the exemptions apply.** Non-federal actions involving state-owned buildings are not subject to review under Section 106, but may require review under state laws.

Note: If the building is part of a local historic district, local zoning ordinances and historic preservation ordinances could restrict these actions or require local approval.

1. Exterior:

- Painting on previously painted surfaces using similar color
- Paint removal by nondestructive means that will not affect the historical fabric of the building
- Repair or replacement of existing walkways with like materials
- Repair or replacement of existing parking areas within the existing footprint and not involving lighting and landscaping changes associated with parking area
- Repair or replacement of existing above ground fuel storage facilities
- Placement of temporary barriers for compliance with DoD Minimum Antiterrorism Standards for Buildings (UFC 4-010-01 8 October 2003)
- Repair of the building exterior when repair or replacement matches existing details, form, and materials.

2. Interior:

- Replace insulation (ceilings, attics, basement spaces, walls, plumbing pipes, hot water heaters, and ductwork) when only the insulation material is physically affected
- Replace non-historic or character defining plumbing as defined in the original determination documentation when only the insulation material is physically affected
- Replace non-historic or character defining heating, ventilation, and air conditioning systems and units as defined in the original determination documentation when only such systems are physically affected
- Replace electrical systems without altering historic fabric
- Replace telecommunications equipment as defined in the original determination documentation when only such equipment is physically affected
- Replace security systems as defined in the original determination documentation when only such systems are physically affected
- Replace fire suppression systems as defined in the original determination documentation when only such systems are physically affected

- Asbestos removal and abatement when it does not involve removal of the historic fabric of buildings and structures as defined in the original determination
- Nondestructive lead paint abatement when it does not involve removal of historic fabric other than paint.

It must be remembered that use of this exemption list does not negate the need for the CRM to review projects. There are guidelines for the treatment and preservation of historic properties contained in *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. The standards can be viewed on the Internet at <http://www2.cr.nps.gov/tps/tax/rhb/index.htm>.

Maintenance and Treatment Plans

A maintenance and treatment plan can be developed as a component of the cultural resources management program and in some cases used to comply with Section 106 of the NHPA. A Maintenance and Treatment Plan (MTP) identifies the historic properties (buildings, structures, landscapes, and districts), their character defining features and contributing elements, building materials and condition, and promotes the preservation of these resources through planning, design, cyclic maintenance, and appropriate treatments for repair, rehabilitation, and restoration. An MTP is a 5-year management plan that provides guidance to the CRMs. The CRMs in turn use this information to work with the maintenance and facilities personnel working with historic structures to address problems of deterioration or failure of building materials and systems and addresses repair and renovation materials that will continue to maintain historic significance of the historic property.

An MTP covers a grouping of buildings that is generally site-specific due to the complexity of each site and overlaying construction periods, and should focus on a range of alternatives and treatments from stabilization to restoration.

Disposal or Demolition of Excess Property

Mission requirement changes sometimes result in the removal, replacement, or disposal of buildings and structures. These actions can have an effect on a historic property under Section 106 of the NHPA. When buildings are to be removed, replaced, or disposed of, determine if the building is 50 years old and has been evaluated for eligibility to be listed in the NRHP. If the building is 50 (or near 50) years old, initiate the Section 106 process (see Appendix I). If necessary, evaluate the building for eligibility. **It should be noted that transfers of property between federal agencies or transfers of property from a state agency to anyone are not considered undertakings with the potential to adversely affect historic properties; accordingly, these actions are not typically subject to Section 106 review.**

If removal or replacement is being considered, conduct an economic analysis on replacement of the building. When rehabilitation costs exceed 70 percent of a building's replacement cost, replacement construction can be used. However, "the 70% value may be exceeded where the significance of a specific structure warrants special attention if warranted by the life-cycle cost comparisons."

If the projects will affect an eligible property, mitigation measures can be developed that reduce effects to a nonadverse level. The measures might include avoidance, preservation in place, rehabilitation, or data recovery. If data recovery is chosen, it is suggested that HABS or Historic American Engineering Record (HAER) documentation be prepared prior to implementation of any activity that could affect the

character or integrity of the historic district. The SHPD or NPS Regional Office, in coordination with the HIARNG, would select the acceptable level of documentation for mitigation purposes.

Even if the building itself is not historic, but is within a historic district, replacement could have an adverse effect on the historic district. If this is the case, consult with the SHPD. If the building to be removed is in, or a contributing element to, a historic district, the goals are to retain the character-defining features, design, and workmanship of buildings, structures, and landscape. If mission requirements cause the demolition and replacement of significant buildings or structures, the replacement design should be compatible with other buildings within and contributing to the historic district. Changes to the landscape should convey the historic pattern of land use, topography, transportation patterns, and spatial relationships.

Force Protection and Antiterrorism Standards

The intent of DoD Minimum Antiterrorism Standards for Buildings (UFC 04-010-01) is to minimize the possibility of mass casualties in buildings or portions of buildings owned; leased; privatized; or otherwise occupied, managed, or controlled by or for HIARNG. These standards provide appropriate, implementable, and enforceable measures to establish a level of protection against terrorist attacks for all inhabited ARNG buildings where no known threat of terrorist activity currently exists. The standards apply to any HIARNG building that uses federal funding for new construction, renovations, modifications, repairs, restorations, or leasing and that meets the applicability provisions will comply with these standards (section 1-6 of Standards, also see exemptions, section 1-6.7). In general, it is applicable to inhabited buildings routinely occupied by 50 or more DoD personnel.

The overarching philosophy of this policy is that an appropriate level of protection can be provided for all HIARNG personnel at a reasonable cost. The philosophy of these standards is to build greater resistance to terrorist attack into all inhabited buildings. The primary methods to achieve this outcome are to maximize standoff distance, to construct superstructures to avoid progressive collapse, and to reduce flying debris hazards.

Implementation of this policy, however, shall not supersede the HIARNG's obligation to comply with federal laws regarding cultural resources to include the NHPA and ARPA. HIARNG personnel need to determine possible adverse effects on a historic structure or archaeological resource prior to antiterrorism standard undertakings and consult accordingly. Conversely, historic preservation compliance does not negate the requirement to implement DoD policy.

In a project sponsored by the DoD Legacy Resources Management Program, the U.S. Army Construction Engineering Research Laboratory (USACERL) conducted a study to identify common circumstances in which UFC 4-010-01 undertakings would conflict with the requirements of the NHPA, and develop specific guidelines that would help installation command, AT, cultural resources, and facilities personnel to rapidly resolve those conflicts in a way that satisfies both sets of requirements. The final technical report, available at https://www.denix.osd.mil/denix/Public/Library/NCR/Documents/RPT_03-176.pdf, interprets UFC 4-010-01 and presents technologies commonly used for UFC compliance. It also identifies AT undertakings that may conflict with the Secretary of the Interior's rehabilitation standards and suggests ways to satisfy dual AT/HP requirements.

The report, **Antiterrorism Measures for Historic Properties** (Webster *et al.* 2006), proposes guidelines for making historic buildings compliant with UFC 4-010-01, while also meeting or being in the spirit of

the Secretary of the Interior's Rehabilitation Standards. A number of recommendations are suggested by the authors, including the following:

- Consider broader environment of base and beyond in assessing needs and designing solutions
- Consider historic building's building materials, structural design, and component in assessing needs and designing solutions
- Consider building use and functions within it in assessing needs and designing solutions
- Integrate security measures in siting and landscaping of historic building. Low retaining walls, decorative fences, trees and vegetation, boulders, and street furniture can serve security benefit.

The decision to demolish a historic building rather than attempting to retrofit it must be justified with a cost analysis and discussion of alternatives examined.

Economic Analysis

The HIARNG is required to conduct an economic analysis of historic buildings and structures that are being considered for demolition and replacement (AR PAM 200-1 section 2-4G(1)(2)). The NHPA requires that historic buildings and structures be reused to the maximum extent possible. However, this must be justified through a life-cycle economic analysis.

Replacement construction may be used when the rehabilitation costs exceed 70 percent of the building's replacement cost. However, the 70 percent value may be exceeded if the structure warrants special attention or if justified by the life-cycle cost comparisons.

The assessment of new construction must include life-cycle maintenance costs, utility costs, replacement costs, and all other pertinent factors in the economic analysis. Replacement costs must be based on architectural design that is compatible with the historic property or district. Potential reuses of the historic structure must be addressed prior to making the final decision to dispose of the property.

The HIARNG must also consider costs associated with the contracting of qualified archaeologists, if needed, or the services of professionals to carry out historic building inspections.

Software is available to aid the HIARNG in the economic analysis of building maintenance costs related to layaway/mothballing, renovation and reuse, and demolition. There is also software for the analysis of window replacement costs.

The program is designed to estimate costs over a 20-year time period. The economic analyses included in the program are

- The cost of each alternative over the life-cycle of the building
- The possible alternatives and additional costs incurred
- The point at which one alternative becomes a more viable option than others

There is also a Window Econometric Computer Program to provide life-cycle cost comparisons associated with the repair or replacement of windows. The Layaway Economic Analysis Tool Software is available on CD by contacting the AEC at 1-800-USA-3845, or online at <http://www.aec.army.mil/usaec/cultural/software.html>. The Layaway Economic Analysis Tool, Version 2.04 developed by the U.S. Army Engineer Research and Development Center / Construction Engineering Research Laboratories, is a Windows 95/98 NT-based software tool available to DoD users in CD-ROM format.

J.2.6 Cultural Landscapes

A **cultural landscape** is “a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values (*Cultural Resource Management Guidelines, NPS-28*).” A cultural landscape can be a

- **Historic site:** the location of a significant event or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archaeological value regardless of the value of any existing structure
- **Historic designed landscape:** a landscape having historic significance as a design or work of art because it was consciously designed and laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or by an owner or other amateur using a recognized style or tradition in response or reaction to a recognized style or tradition; has a historic association with a significant person or persons, trend, or event in landscape gardening or landscape architecture; or a significant relationship to the theory and practice of landscape architecture
- **Historic vernacular landscape:** a landscape whose use, construction, or physical layout reflects endemic traditions, customs, beliefs, or values in which the expression of cultural values, social behavior, and individual actions over time is manifested in the physical features and materials and their interrelationships, including patterns of spatial organization, land use, circulation, vegetation, structures, and objects; and in which the physical, biological, and cultural features reflect the customs and everyday lives of people
- **Ethnographic landscape:** a landscape traditionally associated with a contemporary ethnic group, typically used for such activities as subsistence hunting and gathering, religious or sacred ceremonies, and traditional meetings.

Cultural landscapes, as defined here, are a type of historic property addressed in terms of National Register eligibility and should not be confused with the “cultural landscape approach”. The cultural landscape approach is a comprehensive planning approach that incorporates historic properties along with all other categories of cultural resources.

Under Section 106 of the NHPA (see Appendix I), the following actions have the potential to have an adverse effect:

- Renovations and upgrades to contributing components of the cultural landscape

- Demolition or replacement, and/or relocation of contributing components of the cultural landscape
- Modern elements added or constructed into a cultural landscape
- Property lease, transfer, or sale

Upon being advised by the project proponent of proposed operations or maintenance activities, renovations or upgrades, demolition, new construction, major landscaping projects, transfer, replacement, relocation, or sale or lease of property that could affect a property that is 45 years old or older and has an undetermined historic status, the CRM must determine its eligibility for the NRHP. If the property is determined eligible, the project represents an undertaking that has the potential to effect historic properties and must be reviewed under Section 106 of the NHPA. CRMs must also review projects involving ground disturbance (landscaping, utility excavations, building demolition or construction) to determine the potential for the project to affect archaeological sites.

If the HIARNG is managing cultural landscapes, the CRM should consider developing an agreement document with the SHPD or NHOs, as well as the development of an SOP (Chapter 3). Refer to section J.2.4 for inadvertent discoveries.

There are guidelines for the treatment and preservation of historic properties contained in The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes. The standards can be viewed on the Internet at <http://www2.cr.nps.gov/hli/introguid.htm>. Information is also available in the National Park Service publication, Preservation Brief #36: Protecting Cultural Landscapes.

J.3.7 Other Cultural Resources

Other cultural resources include places or objects that a community of people value for their role in sustaining a community's cultural integrity. These places that are important to a community tradition or activities could be eligible for listing in the NRHP and should be evaluated.

Even in those instances where evaluation of a resource considered important to a community or to NHOs results in a determination that the resource is not eligible for listing on the NRHP, potential impacts to the resource can still be considered under NEPA. NEPA procedures offer the public a chance for comment on projects that might affect places of community significance.

Sacred Sites

According to EO 13007, a "sacred site" is "any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site."

Restricting access to information regarding sacred sites is recommended and will ensure a positive working relationship with NHOs. Refer to section 2.5 regarding information restriction requirements.

Consultation with NHOs should be conducted to identify their cultural resources management concerns, specifically with sacred sites. If sacred sites have been suspected during a survey, local federally recognized NHOs should be notified. Refer to the POC List of NHOs in **Appendix F**.

Per AIRFA and EO 13007, NHOs have the right to access and use sacred sites on HIARNG-controlled lands. Reasonable terms, conditions, and restrictions regarding access to sacred sites will be agreed upon in order to protect personal health and safety and to avoid interference with the military mission or with national security. Sacred sites may be used for ceremonies that take place one or more times during a year. Reasonable notice should be given by the HIARNG if mission actions prohibit NHOs access to a sacred site.

Avoid adversely affecting the physical integrity of sacred sites. If the site is adversely affected or has potential of being adversely affected, NHPA Section 106 procedures must be complied with. See **Appendix I** regarding Section 106 procedures.

Cemeteries

For assessing the significance of cemeteries, and gathering information that can be used for their subsequent preservation and protection, the CRM should follow the guidelines outlined in the National Register Bulletin “Guidelines for Evaluating and Registering Cemeteries and Burial Places” and SHPD’s Burial Sites Program.

The Army management responsibilities with respect to cemeteries located on an installation depends on whether the facility is a National Cemetery Administration (NCA), Department of Veterans Affairs (VA) cemetery; Army National Cemetery; post cemetery; or private cemetery. For these categories of cemetery (i.e., burials in designated and marked cemeteries), CRMs should follow the guidance in AR 210-190, found at http://www.army.mil/usapa/epubs/pdf/r210_190.pdf (see **Appendix I**).

CRMs should also note that many states have laws relating to cemeteries and unmarked graves; for example, Arkansas Act 753 of 1991, as amended, makes it a class D felony offense to knowingly disturb a human grave.

The HIARNG has no plans to disturb the cemeteries on its lands. Known cemeteries on HIARNG lands are fenced for protection, monitored periodically for integrity, and are identified on site and training installation plans as sensitive resource areas to be avoided.

Historic Objects

Historic objects can include records, photographs, artifacts, and donated private collections that are associated with the HIARNG’s military history. These objects should be inventoried and ownership determined. The Army currently does not provide funding for preservation and conservation of historic objects in its inventory, apart from those in designated museums. CRMs should coordinate with the HIARNG historian, if one has been assigned, or with the NGB historians in the Public Affairs Office, regarding procedures for dealing with historic objects.

J.3 Native Hawaiian Organization Consultation

The NHPA, EO 13007, EO 13175, US DoD Instruction 4710.03 Consultation Policy with Native Hawaiian Organizations and Presidential Memorandum for Heads of Executive Departments and Agencies dated 29 April 1994: Government-to-Government Relations with Native American Tribal Governments, DoDI 4710.02, and the Annotated Policy Document for DoD American Indian and Alaska Native Policy, dated 27 October 1999, require federal agencies to consult with NHOs.

Consultation takes on many forms. The HIARNG might need to consult on a project basis for proposed actions that might affect cultural resources of interest to NHOs. If HIARNG activities have the potential to affect native Hawaiian archaeological sites or resources, all interested NHOs will be consulted early in the planning process and their concerns will be addressed to the greatest extent possible. Establishing a permanent relationship with NHOs will lead to better understanding of each party's interests and concerns and development of a trust relationship. This will streamline future project-based consultation and streamline the inadvertent discovery process.

It is the goal of the consultation process to identify both the resource management concerns and the strategies for addressing them through an interactive dialogue with appropriate NHOs and individuals.

J.3.1 Issues and Concerns

Issues are both general and particular. On the one hand, native Hawaiian groups might attach religious and cultural values to lands and resources on a very broad scale, such as recognizing a mountain or a viewshed as a sacred landscape, and they could be concerned about any potential use that would be incompatible with these values. On the other hand, issues could be specific to discrete locations on public lands, such as reasonable access to ceremonial places, or to the freedom to collect, possess, and use certain regulated natural resources such as special-status species.

Many native Hawaiian issues and concerns, although associated with HIARNG lands and resources, are based on intangible values. Intangible values are not amenable to "mitigation" in the same way that a mitigation strategy can be used to address damage to, or loss of, physical resources.

Some of the issues that frequently surface in consultation are briefly discussed here to illustrate the relationship of native Hawaiian interests and concerns to HIARNG land and resource management decisions.

Access. Free access to traditionally significant locations can be a difficult issue for HIARNG managers when there would be conflicts with other management obligations. For example, individuals' age or infirmity often combine with distance or terrain to make motorized vehicle access the only practical means for some native Hawaiians to reach locations of religious importance. This presents a dilemma to managers where public lands are being managed as sensitive riparian habitat or for their wilderness character, for example, and motorized vehicle access is accordingly restricted or prohibited. The HIARNG can end up in the contradictory situation of trying to protect resources and landscapes—the continuing existence of which is essential to traditional Hawaiian practices—from the Hawaiian practitioners themselves.

Use. One of the more tangible issues with potential for resource conflict is that native Hawaiians collect and use plants and animals for traditional religious or cultural purposes. Some species regulated under

the Endangered Species Act could have religious or cultural significance. Collection of other resources, such as plant products, minerals, and gemstones, might be regulated under other statutory authority and/or HIARNG policy.

Sacredness. Native Hawaiians attribution of sacredness to large land areas is one of the most difficult issues for HIARNG managers to reconcile with other management responsibilities. From the viewpoint of traditional religious practitioners, a particular land area could be regarded as a hallowed place devoted to special religious rites and ceremonies. Practitioners might perceive any secular use or development in such a place to be injurious to its exceptional sacred qualities or a sacrilege and, therefore, unacceptable from their view. Nevertheless, the HIARNG manager might be put in the position of having to weigh a proposal for a legally and politically supported use such as mineral development in an area regarded as sacred and inviolate.

Mitigation. Strategies to reduce impacts of proposed federal actions or the effects of proposed undertakings generally follow models related to NEPA, the NHPA, and their implementing regulations (40 CFR Parts 1500–1508 and 36 CFR Part 800). Where American Indian cultural and religious concerns are involved, however, conventional methods of mitigation generally do not appropriately address the consequences felt by American Indian practitioners.

The fact that the CRMs are frequently the ones assigned to do the staff work for certain native Hawaiian issues could lead to some misunderstanding that Hawaiian issues are cultural resources issues. From there it could be mistakenly deduced that native Hawaiian issues might often be resolved through mitigation methods such as archaeological data recovery. Such ideas would misinterpret the majority of native Hawaiian issues that managers must consider in decision-making.

It is feasible, where some issues of native Hawaiians use are involved, that mitigation procedures could work. For example, mitigation could work in cases where common natural products are the object, and either the HIARNG proposal or the native Hawaiian use is flexible.

That is, it could be possible for an HIARNG proposal to be modified to allow continuing traditional resource use, or it might be acceptable for the American Indian use to be moved outside the proposed affected area. In contrast, however, more abstract, nonresource issues surrounding belief and practice could be a much different matter.

Consultation as Conflict Identification. Consultation is sometimes approached apprehensively, with a view that talking with native Hawaiians will result in more intractable problems than existed before. This view can be relieved by awareness that many native Hawaiian issues and concerns are not much different from public issues and concerns that the HIARNG deals with on a regular basis, and that the means for dealing with them are basically the same.

It is possible for the HIARNG to address many of the concerns for gaining access to sites, attaining needed materials, and protecting native Hawaiian values, within the normal scope of multiple use management. Solutions can include: (1) providing administrative access to sensitive areas; (2) making special land use designations; (3) developing cooperative management agreements with native Hawaiian communities; (4) stipulating for continuing native Hawaiian uses in leases, permits, and other land use authorizations; (5) diverting or denying clearly incompatible land uses; and (6) similar affirmative management solutions.

Consultation should identify not only native Hawaiian interests and concerns, but also their suggestions for potentially effective approaches to address them.

Consultation is incomplete and largely pointless unless it is directed toward the identification of mutually acceptable solutions.

When a proposed HIARNG decision poses potential consequences for lands and resources valued by native Hawaiians, consultation with the community that holds the values and identified the consequences can generate strategies for an appropriate management response.

A list of Native Hawaiian Organizations (NHOs) and POCs is included in **Appendix F**.

Timing for consultation with NHOs will vary depending on the consultation methods, the nature of the ongoing relationship, and the purpose of the consultation. Consultation to develop understanding of interests and concerns with land and resource management, and establishing procedures for working together, is a continuous and ongoing process.

For project-specific consultation, the CRM should send appropriate reports and documentation to potentially affected NHOs describing the proposed action and analysis of effects (either Section 106 or NEPA documents) and request comments and input. After 30 days, the CRM should follow up with NHOs for input if no correspondence has been received. A thorough MFR must be kept. For projects of particular interest to NHOs, the CRM could consider a site visit and meeting with affected NHOs.

J.3.2 Consultation Resources

The following agencies can provide useful information and guidance on how to identify NHOs with interests in the lands within the HIARNG virtual installation and how to consult with NHOs under AIRFA, NHPA, NEPA, ARPA, and NAGPRA. Representatives from these agencies are also often available to facilitate consultations.

DoD Tribal Liaison Office: <https://www.denix.osd.mil/denix/Public/Native/native.html>

SHPD: <http://dlnr.hawaii.gov/shpd/>

Recently, HIARNG has reconnected with their consultation partners and invited additional NHOs and external stakeholders (see **Table J-2**) to consult on proposed undertakings statewide and at each site and installation, including the 2016-2021 ICRMP. This list of NHOs and external stakeholders should be updated as contacts are made.

NEIL ABERCROMBIE
GOVERNOR



DARRYL D.M. WONG
MAJOR GENERAL
ADJUTANT GENERAL

JOSEPH K. KIM
BRIGADIER GENERAL (HI)
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

November 7, 2013

SUBJECT: Invitation to Participate in Consultation on Hawaii Army National Guard Undertakings¹.

Aloha,

The Hawaii Army National Guard would like to extend an invitation to consult with your organization when we propose an undertaking that may have an adverse affect on a historic property or place of traditional religious or cultural importance. We would like to establish a consultation program to keep you informed and allow ample time for you to voice your concerns and give input on future Hawaii Army National Guard actions. This consultation effort is intended to ensure meaningful participation in planning and decision-making processes for actions with the potential to affect any native Hawaiian interests. your organization would be consulted on undertakings at any or all of our 14 installations in Hawaii.

The following is a list of all Hawaii Army National Guard sites within the State of Hawaii.

1. Keaau Armory (Keaau, Hawaii Island)
2. Keaukaha Military Reservation (Hilo, Hawaii Island)
3. Kealahou Armory (Kealahou, Hawaii Island)
4. Puunene Armory (Puunene, Maui)
5. Ukumehame Firing Range (Ukumehame, Maui)
6. Kaunakakai Armory (Kaunakakai, Molokai)
7. Fort Ruger Head Quarters (Diamond Head, Oahu)
8. Wahiawa Armory (Wahiawa, Oahu)
9. Regional Training Institute (Waimanalo, Oahu)
10. Waiawa Armory (Waiawa, Oahu)
11. Kalaeloa (Kapolei, Oahu)
12. Kapaa Armory (Kapaa, Kauai)
13. Hanapepe Armory (Hanapepe, Kauai)
14. Kekaha Firing Range (Kekaha, Kauai)

¹ A project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.

SUBJECT: Invitation to Participate in Consultation on Hawaii Army National Guard Undertakings.

The Following is a list of Potential Undertakings by the Hawaii Army National Guard:

1. Update or revision of the Integrated Cultural Resources Management Plan (ICRMP)
2. Update or revision of the Integrated Natural Resources Management Plan (INRMP)
3. Contracting of archaeological surveys, reports and monitoring plans
4. Contracting of historic building surveys and reports
5. Any project or activity that may affect a historic property with religious or cultural importance
6. Any ground disturbing activities that may result in the inadvertent discovery of cultural items
7. Increased soldier training or changes of activity at one of our installations
8. Repair or maintenance to one of our National Register eligible historic buildings
9. The development of cultural resource awareness training tools
10. The development of Programmatic Agreements (PA) or Memorandums of Understanding (MOU) with the Hawaii State Historic Preservation Office

We would like to request your acknowledgement and preferences for future consultation with the Hawaii Army National Guard. If accepting, please include the installation(s) and/or undertaking(s) you wish to be consulted on. Please respond within 45 days if you are interested in consulting with the Hawaii Army National Guard. We look forward to hearing from you. If these installations and/or undertakings do not appeal or fall under your organization's expertise, no response is necessary. Feel free to provide other Native Hawaiian organizations that you feel may be interested in consultation with the Hawaii Army National Guard as well.

Please mail your response to the sender's address below, or email your response to kristine.p.macdonald.nfg@mail.mil. Should you have questions or require additional information, please contact Ms. Kristine Macdonald, Cultural Resources Specialist, at (808) 672-1264.

Mahalo,



Darryll D. M. Wong
Major General, Hawaii National Guard
The Adjutant General

Return Address:

State of Hawaii/Dept of Defense
Hawaii Army National Guard
NGHI-ENV / Attn: Kristine Macdonald
3949 Diamond Head Road
Honolulu, HI 96816-4495

Table J-1. NHOs and External Stakeholder Invited to Consult.

NHOs and External Stakeholders	Response
Ahahui Siwila Hawai'i O Kapolei Lance Holden	Consult on Kalaeloa – Kaleo Keawe-Aiko
Aha Kane G. Umi Kai	
AhuMoku O Kahikinui Donna D. Sterling	
Ahu Moku Maui Inc. Ke'eaumokuKapu	
Aha Wahine Linda Kaleop Paik	
Ahupua'a o Moloka'i Kammy Purdy	
Aloha First Dennis Kanahele	
Association of Hawaiian Civic Clubs Soulee LKO Stroud	
Association of Hawaiians for Homestead Lands Blossom Feieria	Return to Sender
Au Puni O Hawaii Samson L. Brown	
Brian Kaniela Nae'oleNaauao Brian KanielaNae'oleNaauao	
Charles Pelenui Mahi Ohana Maydean k. Bowman	
Council for Native Hawaiian Advancement NapaliWoode	
Diamond Head Citizens Advisory Committee/ Friends of Diamond Head	
Four Points Global Services Corp. Howard N. Joy	
Friends of Iolani Place Kippen de Alba Chu	
Friends of Moku'ula Blossom Feiteira	Consult on Puunene and Ukumehame

NHOs and External Stakeholders	Response
George K. Cypher Ohana Mahealani Cypher	
God's Country Waimanalo Ilima Ho-Lastimoso	
Hau'ouwi Homestead Association on Lanai Winifred Basques	
Hawaiian Maoli Henry Gomes	
Hawaiian Civic Club of Hilo Antoinette K. Mallow	
Ho Ohana Ilima Ho-Lastimo	
Hookano Family Land Trust Dawn N.S. Chang	
HuiHooniho Edward Halealohayau *check spelling	
Hui Huliau Adrian Silva	
Hui Kakoo Aina Hoopulapula Kaipo Kinkaid	Return to sender
Hui Kaleleiki Ohana Jaynie I. Stone	
Hui Malama I Na Klupuna O Hawaii Nei Edward HalealohaAyau	
Kakoo Oihi Mahealani Cypher	
Kalaeloa Heritage and Legacy Foundation Melissa M. Lyman	
Kalamaula Mauka Homestead Association Victoria Kapuni	Return to sender
Kamealoha Thomas Kamealoha	
Kamehameha Schools PiilaniHanohano	
Kamiloloa One Alii Homestead Association Vivian L. Ainoa	

NHOs and External Stakeholders	Response
Kanu o kaina Learning Ohana Taffi Wise	
Kapolei Community Development Corporation Shirley S. Swinney	
Kapolei Hawaiian Civic Club Lance Holden	
Kawaihapai Ohana Thomas T. Shira Jr.	Consult on Wahiawa, Waiawa, Ft. Ruger, Kalaeloa
Keoni Kealoha Alvarez Keoni Kealoha Alvarez	
Koolau Foundation Mahealani Cypher	
Koolaupoko Hawaiian Civic Club Mahealani Cypher	
Lahui Kakaikahi Kaleo Keeno	
Lai Opua 2020 Craig V. Kahui	
Ma'a Ohana c/o Lani Ma'aLapilo Lani Ma'a Lapilo	Return to sender
Machado-Akana-Aona-Namakaeha Ohana Brenda Luana Machado Lee	
Mahu Ohana Keona Mark	
Makaha Hawaiian Civic Club Lu Faborito	
Makuu Farmers Association Paula K. Kekahuna	
Maluohai Residents Association HomelaniSchaedel	Consult on Kalaeloa
Meleana Kawaiaea LLC Paul Richards	
Moku o Kaupo Jade Alohalani Smith	Consult on all federal land undertakings
Na Aikabe O Maui Uilani Kapu	

NHOs and External Stakeholders	Response
Na Kuauhau o Kahiwakaneikoolei H. Kanoeokalani Cheek	
Na Ohana o Puaoi a me Hanawahine Roxanne Hanawahine	
Nanakuli Housing Corp Paige Kapiolani Barber	
Native Hawaiian Church Kaleo Patterson	
Native Hawaiian Economic Alliance NapaliWoode	
Native Hawaiian Education Council Wendy Hee	Decline to participate
NekaifesOhana Maraea K. Nekaifes	
O'ahu Island Burial Council Shad Kane	Consult on cultural, NAGPRA, digging
Office of Hawaiian Affairs Kamana'opono M. Crabbe	Consult on cultural, NAGPRA, digging
Ohana Keaweamahi Paulette Kaleikini	Consult on NAGPRA
One Alii Homestead Association Vivian L. Aiona	
Pacific American Foundation Herb Lee	
Pacific Justice & Reconciliation Center Kaleo O Patterson	
Papa Ola Lokahi Hardy Spoehr	
Papakolea Community Development Corporation B. Puni Kekauoha	
Paukukalo Hawaiian Homes Community Association Olinda Aiwohi	
Peahi Ohana Apela Peahi	
Piihonua Hawaiian Homestead Association Kaleo Aki	Consult on all undertakings

NHOs and External Stakeholders	Response
Royal Hawaiian Academy of the Traditional Arts L. LaakeaSuganuma	
The Friends of Hokulea and Hawaiiloa William K. Richards Jr.	
The I Mua Group Melvin Soong	
Waianae Hawaiian Civic Club Mele Worthington	
Waiehu Kou Phase 3 Association Roy Oliveira	
Waimānalo Hawaiian Homes Association	

J.4 Stakeholder and Public Involvement Plan

Stakeholder and public involvement and community outreach can be driven by regulation in project-specific cases, or can be a proactive method of partnering with interested parties to achieve long-range goals and solicit program support. The following section describes some methods to involve stakeholders and the public for projects or programs.

Stakeholders can include

- SHPD
- NHOs
- Veterans organizations
- Interested public
- Federal and state agencies
- Special interest groups
- Local historical committees and societies
- Tenants, lessees, and land users (hunters, fishermen, boy scouts, police)
- Neighbors
- Landowners
- Contractors

- NGB
- Integrated Readiness Training
- Reserve Officer Training Corps (ROTC)
- ODEP/AEC.

Consultation with NHOs is required by several cultural resources laws, regulations, and EOs; and DoD policy and is good stewardship of cultural resources. Tribal consultation is addressed in section J.3 and Appendix I.

J.5.1 Public and Stakeholder Involvement and Outreach

Public participation and involvement are required for most environmental programs, including cultural resources. Regulation 36 CFR 800.2(d) requires that the HIARNG seek and consider public views in its undertakings that could have an effect on historic properties. For tribal consultation see section J.3. Benefits of public involvement to the HIARNG include

- Opening the decisionmaking process to the public and building credibility
- Assisting with the identification of issues
- Enhancing mutual understanding of stakeholder values and HIARNG management challenges
- Making better decisions
- Minimizing delays and enhancing community support.

If HIARNG plans have the potential to affect a historic property and an EA or EIS is deemed unnecessary, public involvement is still expected. Under Section 106 regulations, federal agencies are required to involve the public in the Section 106 process. This includes the identification of appropriate public input and notification to the public of proposed actions, consistent with 36 CFR 800.2(d). The HIARNG may choose to follow the same process as stipulated in NEPA for EAs.

The regulations also state that, to streamline the process, the public involvement requirements under NEPA should be incorporated into cultural resource planning and projects when activities require the development of an EA or an EIS.

For any adverse effect, it is the HIARNG's responsibility to determine which stakeholders may have an interest, e.g., local historic preservation group, statewide nonprofit preservation organization, and determine the level of public involvement needed. However, in accordance with 32 CFR Part 651.28, a REC can be used if the SHPD concurs with the action.

Timing: For Section 106 projects and EAs, anticipate approximately 6 to 9 months to complete the compliance process, more complex projects can take longer. If an EIS is required, plan for 12 to 16 months to complete. Again, a complex or controversial project could take up to 3 years to complete. Public Involvement requirements are included in these time estimates.

Distribution of Documents

Public notices can be posted in places where people gather or visit such as the local post office or grocery stores. Public notices should also be placed in the local newspaper.

While interacting with private newspapers, it is important to recognize that the audience might not appreciate the military mission or community. Whenever possible, points should reflect positively on the ARNG and be made in a clear and noncontroversial manner.

Special efforts will be made to use newspapers to acquaint the surrounding communities with the overall cultural resources program at the various HIARNG sites and training installations. It is to the benefit of the HIARNG to inform the public of these programs. This can be achieved through press releases. In addition to the newspaper, press releases can be sent to local magazines or Web-based news sites.

Libraries are excellent repositories to allow for public access to documents for review. Most communities, schools, and universities have libraries.

J.5.2 Public Involvement Opportunities

Education can promote awareness of important HIARNG cultural resources projects and the rationale behind them. Actions such as selling a historic building require effective communication to get positive support and, perhaps more importantly, to avoid adverse impacts and reactions from various public groups. A preservation awareness program must be directed to both HIARNG and external interests if it is to be effective.

J.5.3 Special Events

Special events with local and national significance offer excellent opportunities to educate the public on cultural resources preservation. Events such as Earth Day (22 April), Fourth of July, Veteran's Day, National Historic Preservation Week (third week in May), National Public Lands Day (last Saturday in September), and local town celebrations are opportunities for the ARNG to help educate people about cultural resources and preservation principles. Section J.7 contains Web sites that can aid HIARNG in this task.

J.5.4 Executive Order 13287 (Preserve America)

In addition to the reporting requirements outlined in section J.1.3, EO 13287 encourages federal agencies to preserve America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the federal government; promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties; inventorying resources; and promoting heritage tourism. Some ideas for promoting this EO include

- Virtual tours of historic facilities or sites
- Partnerships
- Museum and exhibits

- Veteran's history project
- Traveling exhibits
- Walking tours

J.5.5 Other Opportunities for Outreach

Other methods for reaching external stakeholders include

- Public forums
- Web sites
- Scoping meetings
- Questionnaires and feedback sheets
- Public notices
- Presentations at various forums and gatherings
- Cross training the HIARNG staff to be a liaison
- Society meetings.

By knowing who the interested public is, other methods will come to light.

J.5.6 Public Affairs Office

The PAO performs more of an oversight and guidance role with respect to public involvement issues. The PAO maintains liaison with the project proponent, CRM, JAG, and other NGB offices. In support of NEPA and NHPA actions, the Public Affairs Environmental Office assists the project proponent in the preparation of press releases, public notices, and other information. The PAO environmental office provides guidance for planning and coordination, conducts public meetings or hearings for the HIARNG, supports the project proponent during the NEPA process, and reviews all NEPA documents.

Any public involvement plans, outreach, special events, or informational briefings should be developed and implemented by the HIARNG PAO. If such activities do not originate in the PAO, the office should approve them.

Public notices published in support of EAs should be submitted to the PAO in the form of a three-column commercial advertisement and should be published at least 3 consecutive days. The PAO should insist on a tear sheet from the newspaper or a notarized copy of the public notice advertisement to ensure the ad has run and the program manager or the PAO has proof of publication.

J.6 Agreement Documents

In some cases, streamlining Section 106 regulations, addressing issues under NHPA, NAGPRA, and EO 13175; and the consultation process can be accomplished through the use of an MOA, PA, CA, or plan of action and MOU.

MOAs are agreement documents for specific undertakings on how the effects of the project will be taken into account (36 CFR 800.5(e)(4)), and, in general, used as a mitigation agreement document for the adverse effects of a single undertaking. The agency, the ACHP, the SHPD/NHOs, and possibly other consulting parties negotiate MOAs. These agreement documents govern the implementation of a particular project and the resolution of particular effects of that project.

PAs are, in general, used to govern the implementation of a particular program or the resolution of adverse effects from certain complex projects or multiple undertakings. PAs are negotiated between the agency, the ACHP, the SHPD/NHOs, and possibly other consulting parties. These agreement documents may be used when

- Effects on historic properties are similar and repetitive or are multistate or regional in scope
- Effects on historic properties cannot be fully determined prior to approval of an undertaking
- Nonfederal parties are delegated major decisionmaking responsibilities
- Routine maintenance activities are undertaken at federal installations, facilities, or other land management units
- Circumstances warrant a departure from the normal Section 106 process.

CAs are similar to a PA structure and used to establish the repatriation process under NAGPRA. CAs are negotiated between the agency, the NHOs, and possibly other claimant groups or parties. These agreement documents can govern the notification process, reburial procedures, limitations, custody procedures, and monitoring plans. CAs are particularly useful when it is known upfront that remains or funerary objects are likely to be encountered.

A plan of action is prepared after an inadvertent discovery under NAGPRA is made (e.g., human remains or items of cultural patrimony) and is prepared after a consultation meetings with the appropriate NHOs. The plan is a presentation of the verbal agreements that are made during the consultation regarding the extraction of the remains, length of time out of the ground, disposition while out of the ground, who the remains will be repatriated to and in what manner, information about the public notice that must be published (e.g., in local and state newspapers before repatriation, in two notices, one week apart), and a description of the repatriation process.

MOUs in general, are used to clarify protocols and roles and responsibilities. The agency, the SHPD/NHOs, and other consulting parties can negotiate MOUs. These documents are used as a tool to ensure that all involved parties are informed of, and agree upon, the details of a particular cultural resources management program.

Procedures for PAs and MOAs are outlined in AR 200-1. NGB can provide sample documents. Draft MOAs, PAs, CAs, and plans of action must be reviewed by NGB and ODEP/AEC. Development of agreement documents requires public and stakeholder involvement.

The following is the list of attachments accompanying all types of draft agreement documents to be sent to the NGB, as appropriate to the action:

1. Cost estimate
2. Form 420 R or 1391 – signed
3. State JA Email stating he/she has reviewed the draft MOA
4. Any supporting documents as applicable

Timing: Preparation and review time for agreement documents will vary with complexity of issues and the number of parties involved. The review process is as follows:

- HIARNG drafts the agreement document
- NGB (including NGB-JA and other divisions) reviews, any comments are sent back to the HIARNG for incorporation
- ODEP and AEC reviews and submits comments to NGB to the HIARNG for incorporation
- NGB reviews for legal sufficiency (2nd review)
- NGB, Chief, ARE signs, if no changes needed
- HIARNG representative signs (i.e., TAG, CFMO) signs
- SHPD signs
- Other signatories sign

At a minimum anticipate:

- MOA – 4 to 6 months
- PA – 6 to 12 months
- CA – 6 to 12 months
- Plan of action – 6 to 12 months
- MOU – 4 to 6 months

J.7 Sustainability in Cultural Resources Management

The federal government encourages agencies to take the lead in being stewards of the environment, to preserve today's resources for the future. EO 13423 *Strengthening Federal Environmental, Energy, and Transportation Management* advocates a variety of approaches to assist agencies in reducing waste,

saving resources, and promoting environmentally friendly design. The CRM should coordinate sustainability efforts with the HIARNG's Environmental Management System (EMS).

One of the primary focuses of stewardship within the DoD is the concept of sustainability; this concept applies to design, construction, operations, and resource conservation. Sustainability is responsible stewardship of the nation's natural, human, and financial resources through a practical and balanced approach. Sustainable practices are an investment in the future. Through conservation, improved maintainability, recycling, reduction and reuse of waste, and other actions and innovations, the HIARNG can meet today's needs without compromising the ability of future generations to meet their own.

Applying sustainability principles to cultural resources management, chapter 4 of the NPS publication *Guiding Principles of Sustainable Design*, notes that "sustainability has often been an integral part of the composition of both tangible and intangible cultural resources. Ecological sustainability and preservation of cultural resources are complementary. In large part, the historic events and cultural values that are commemorated were shaped by humankind's response to the environment. When a cultural resource achieves sufficient importance that it is deemed historically significant, it becomes a nonrenewable resource worthy of consideration for sustainable conservation. Management, preservation, and maintenance of cultural resources should be directed to that end." (http://www.nps.gov/dsc/d_publications/d_1_gpsd_4_ch4.htm#2)

J.7.1 Archaeological Sites

Archaeological sites offer a special challenge for implementation of sustainability initiatives for several reasons. The need to protect site locations has long been seen as a hindrance to training or Master Planning on installations, as it represents a competing land use requirement. Completion of archaeological predictive models and surveys help reduce the footprint of parcels where training or development is restricted; however, few ARNG parcels have been completely surveyed for archaeological resources. As installations are increasingly effected by encroachment, any restriction on land use within the installation is seen as counterproductive to the mission.

Archaeological sites provide a physical record how people have interacted with their environment in the past and what that tells us of how they led their lives. It is the product of ongoing change, stretching from the distant past into the present. Physically, this record is non-renewable – in each period, a combination of natural and cultural processes almost inevitably impacts the record of previous periods. Intellectually, the record is in a constant flux of discovery, redefinition and interpretation through archaeological investigation and dissemination. Present uses will provide grist for the archaeologists of the future - the physical record of how we have lived and treated our environment and how much of *our* past we pass on to our successors.

In an analysis of how archaeology could contribute to sustainable development initiatives (<http://www.britarch.ac.uk/conserv/ArchQOL.html>), the Council for British Archaeology concluded that archaeology and the historic environment are:

- the only source for understanding the development of human society in prehistoric and much of historic times
- a source of enjoyment and interest through intellectual and physical engagement and leisure-time pursuits, contributing to general mental, spiritual and physical health
- an important medium for general education, life-long learning and personal development

- a vital basis of people's awareness of historical and cultural identity, sense of community and place, and a key source of perspective on social change
- a non-renewable record of people's long-term social, spiritual and economic relationships and their interaction with all parts of the environment
- a fundamental determinant of environmental character, bio-diversity and cultural diversity
- a catalyst for improving the distinctive qualities of places where people live and work or which they visit
- a means of understanding long-term environmental change in relation to sustainability
- a source of evidence about past use of renewable energy and recyclable resources such as water, timber, mineral resources, and organic waste
- a source of added value in economic and social regeneration
- a major source of revenue through tourism and recreation

These benefits can be maximized by enhancing people's awareness of archaeology and the historic environment and developing a culture, within government and the private sector and in their dealings with others, of promoting active involvement, care and appreciation for the benefit of present and future generations.

Archaeology and the historic environment contribute significantly to people's quality of life. The ARNG has a responsibility for stewardship of this environment so that it can continue to inform present and future populations about our shared past. At the same time, stewardship must be integrated into the ARNG mission. In addition to promoting public awareness of archaeological information and the benefits of preservation to the larger installation community (see Public Outreach and Awareness discussion elsewhere in this appendix), there are a number of new initiatives being explored to integrate archaeology into the success of the mission.

The Cultural Resources Program at Fort Drum, for example, has pioneered the following initiatives as part of a DoD Legacy Resources Management Program project:

- A program to "harden" historic archaeological sites for the dual purposes of protecting sites from natural erosion and facilitating their use for military training; this program involves covering sites with geotextile fabric, sand, and gravel, and then allowing units to park vehicles within the site for various training exercises. The program has received approval from the New York SHPO and is completed with ITAM funds.
- A program to create models of archaeological features, of the types likely to be encountered by soldiers mobilized in the Middle East, for use during training exercises. This program educates the soldier in how to identify cultural features and maneuver within the environment of an archaeological site in a manner that reduces or avoids damage to significant resource areas.
- A program to develop training scenarios that include archaeological sites and protection issues (e.g., halting looting or damage) to provide more realistic training for soldiers before they are mobilized overseas, and to increase awareness of archaeological issues at home.
- Development of playing cards with archaeological content for distribution to units being mobilized overseas. The cards include information on the prehistory of the areas (Iraq and Afghanistan) where the units will operate, identify important features of the landscape, and present information on preservation and protection issues related to archaeological sites in these countries.

Appendix K includes slides from a Power Point presentation given by the Fort Drum cultural resources staff on the site hardening program, and an example of a training scenario developed for use at Fort Drum. Copies of other materials developed by Fort Drum are available on DENIX, or by contacting the cultural resources staff at Fort Drum.

J.7.2 Building Renovation and Repair

Renovation of older buildings, compared to new construction, could result in considerable energy savings and reductions in materials used, thus benefiting the environment. In addition to reducing project costs, there might also be significant savings in time and money associated with reduced regulatory review and approvals. Additional reduced costs can occur with sustainable aspects of site and construction debris management.

In the event that buildings aren't suitable for renovation, salvage as much as possible from the buildings being demolished. Salvage of historic materials reduces landfill pressure, preserves important character-defining features of historic buildings, and saves natural resources. Typical examples of salvageable materials include lumber, millwork, certain plumbing fixtures, and hardware. Make sure these materials are safe (test for lead paint and asbestos), and don't sacrifice energy efficiency or water efficiency by reusing old windows or toilets.

Sustainable renovations also could provide opportunities for enhanced cooperation with local regulatory authorities, as well as providing site enhancement potential. The alternatives could be less expensive, more environmentally responsible, and potentially more aesthetically pleasing.

A comprehensive job-site waste-recycling program should be part of any renovation plan. Some construction waste materials can be sold, thus recovering the investment in separation and separate storage. More significant savings are often achieved through avoided expense of landfill disposal. In large projects, the savings can be dramatic. A flyer regarding salvage of historic materials is included in **Appendix K**.

Additional guidance related to green building design and building operations can be found in AR Engineering Technical Letter 1110-3-491 "Sustainable Design for Military Facilities (2001)." The HIARNG seeks to meet LEEDS Silver standards for all new construction.

J.7.3 Landscape Design

Sustainability principles also apply to preservation of landscape elements and undisturbed land that might contain archaeological or sacred sites. Some specific principles include

- Integrate sustainability principles from the onset of project design. Involving technical experts such as archaeologists and landscape architects early in the site-planning process might reduce the need for (and cost of) plantings or landscape modification by identifying ways to protect existing site plantings or landscape features.
- Locate buildings to minimize environmental impact. Cluster buildings or build attached units to preserve open space and wildlife habitats, avoid especially sensitive areas including wetlands, and keep roads and service lines short. Leave the most pristine areas untouched, and look for areas that have been previously damaged to build on. Seek to restore damaged ecosystems.

- Situate buildings to benefit from existing vegetation. Trees on the east and west sides of a building can dramatically reduce cooling loads. Hedge rows and shrubbery can block cold winter winds or help channel cool summer breezes into buildings.
- Value site resources. Early in the siting process carry out a careful site evaluation, including solar access, soils, vegetation, water resources, important cultural landscape elements, pristine or protected natural areas, and let this information guide the design.

J.7.4 Education

Finally, the HIARNG should make education a part of its daily practice: Use the design and construction process to educate leadership, employees, subcontractors, and the general public about environmental impacts of buildings and infrastructure and how these impacts can be minimized.

J.8 Additional Resources

DRAFT Nationwide Readiness Center (Armory) Programmatic Agreement. In accordance with 36 CFR Part 800.14 (b), a nationwide PA is being developed to help streamline the Section 106 process for federal undertakings at readiness centers (armories).

Conservation Handbook. The Conservation Handbook will link to any specific law or regulation.

J.8.1 Web sites

The ACHP Web site provides current preservation news and links to laws and regulations concerning heritage preservation. <http://www.achp.gov>

DENIX – is the central platform and information clearinghouse for environment, safety and occupational health (ESOH) news, information, policy, and guidance. Serving the worldwide greater DoD community, DENIX offers ESOH professionals a vast document library, a gateway to Web-based environmental compliance tools, an interactive workgroup environment, a variety of groupware tools and an active membership community numbering thousands. <http://www.denix.osd.mil>

ICRMP Toolbox on DENIX
<https://www.denix.osd.mil/denix/public/esprograms/conservation/legacy/etb/etbwelcome.htm>

Save America's Treasures. www2.cr.nps.gov/treasures/

The U.S. Environmental Protection Agency Web site provides links to EPA news, topics, laws and regulations, and information sources. <http://www.epa.gov>

Guardnet. <http://guardnet.ngb.army.mil>

The DoD Legacy Resources Management Program Web site explains a Legacy project can involve regional ecosystem management initiatives, habitat preservation efforts, archaeological investigations, invasive species control, Native American consultations, and monitoring and predicting migratory patterns of birds and animals. <http://www.dodlegacy.org>

The NPS, *Links to the Past* Web page is a resource to find information on cultural resource subjects and cultural resource programs. <http://www.cr.nps.gov>

The NRHP Web site provides links to assist in registering a property to the NRHP among other various preservation topics and links. <http://www.cr.nps.gov/nr>

The National Trust for Historic Preservation has an informative Web site of how the private sector preserves America's diverse historic places and communities through education, advocacy, and resources. <http://www.nthp.org>

The Secretary of the Interior's Standards for Rehabilitation Web site describes the intent of the Standards, which is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. <http://www2.cr.nps.gov/tps/tax/rhb/index.htm>

The U.S. Army Corps of Engineers lists links from civil works to historic preservation where they list managing and engineering solutions. <http://www.nws.usace.army.mil>

The USAEC Web site provides a link to the cultural resources that include NHOs, historic buildings and landscapes, archaeology, and the Army Historic Preservation Campaign Plan. <http://aec.army.mil/usaec/cultural/index.html>

The Bureau of Indian Affairs (BIA) Web site provides links to Tribal agencies and Tribal leaders, among other helpful links. <http://www.doi.gov/bureau-indian-affairs>

The Layaway Economic Analysis Tool Software – The mission of the Cost and Economics is to provide the Army decision makers with cost, performance, and economic analysis in the form of expertise, models, data, estimates, and analyses at all levels. Links include ACEIT, AMCOS, Cost and Economic Analysis, Cost Management/ABC. <http://www.ceac.army.mil/>.

State Historic Preservation Office (SHPO) - The State of Hawaii, Department of Land and Natural Resources (DLNR), Historic Preservation Division (SHPD) works to preserve and sustain the History and Culture, Archaeology, and Architecture of Hawaii through the State Inventory of Historic Properties (SIHP), compliance reviews, burial sites program, certified local government program, and the NRHP. <http://dlnr.hawaii.gov/shpd/>

Office of Hawaiian Affairs (OHA) – Is a Native Hawaiian Organization (NHOs), an independent government agency, and a trust whose mandate is to provide the opportunity for a better life and future for all Hawaiians. <http://www.oha.org/>

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U.S. DEPARTMENT OF DEFENSE

**DEPARTMENT OF DEFENSE INSTRUCTION
NUMBER 4710.03:
CONSULTATION POLICY WITH
NATIVE HAWAIIAN ORGANIZATIONS**



Department of Defense INSTRUCTION

NUMBER 4710.03

October 25, 2011

USD(AT&L)

SUBJECT: Consultation With Native Hawaiian Organizations (NHOs)

References: See Enclosure 1

1. PURPOSE. This Instruction:

a. Reissues Directive-Type Memorandum 11-001 (Reference (a)) as a DoD Instruction in accordance with the authority in DoD Directive 5134.01 (Reference (b)).

b. Establishes policy and assigns responsibilities for DoD consultation with NHOs when proposing actions that may affect a property or place of traditional religious and cultural importance to an NHO.

c. Provides the DoD Components in Hawaii with a framework to develop localized processes to facilitate consultation.

2. APPLICABILITY. This Instruction:

a. Applies to OSD, the Military Departments, the Office of the Chairman of the Joint Chiefs of Staff and the Joint Staff, the Combatant Commands, the Office of the Inspector General of the DoD (IG DoD), the Defense Agencies, the DoD Field Activities, and all other organizational entities within the DoD with consultation responsibilities to NHOs (hereinafter referred to collectively as the "DoD Components").

b. Is intended only to improve the internal management of the DoD Components regarding their consultation responsibilities and is not intended to, nor does it, create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity by any party against the DoD, its Components, officers, or any person.

3. DEFINITIONS. See Glossary.

4. POLICY. It is DoD policy that:

a. The DoD respects the traditions and cultures of all native peoples of the United States as well as the strong desire of Native Hawaiians to maintain their rich history and tradition amidst other prevalent influences in American society.

b. The DoD recognizes the special status afforded NHOs by the U.S. Government through various Federal laws, regulations, and policy. The Military Services' long presence in Hawaii has provided the DoD with a strong appreciation for the importance of consultation when proposing actions that may affect a property or place of traditional religious and cultural importance to an NHO.

c. The DoD shall conduct meaningful consultation for the purpose of avoiding or minimizing, to the extent practicable and consistent with law, the effects of DoD Component actions on a property or place of traditional religious and cultural importance to an NHO.

5. RESPONSIBILITIES. See Enclosure 2.

6. PROCEDURES. Enclosure 3 provides procedures and requirements for when, with whom, and how to consult with NHOs, including considerations for natural and cultural resources.

7. RELEASABILITY. UNLIMITED. This Instruction is approved for public release and is available on the Internet from the DoD Issuances Website at <http://www.dtic.mil/whs/directives>.

8. EFFECTIVE DATE. This Instruction is effective upon its publication to the DoD Issuances Website.



Frank Kendall
Acting Under Secretary of Defense for
Acquisition, Technology, and Logistics

Enclosures

1. References
2. Responsibilities
3. Procedures
4. Compliance Measures of Merit

Glossary

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ENCLOSURE 1

REFERENCES

- (a) Directive-Type Memorandum 11-001, “Consultation with Native Hawaiian Organizations,” February 3, 2011 (hereby cancelled)
- (b) DoD Directive 5134.01, “Under Secretary of Defense for Acquisition, Technology and Logistics (USD(AT&L)),” December 9, 2005
- (c) Sections 691-716 of title 48, United States Code (also known as “The Hawaiian Homes Commission Act, as amended”)
- (d) Public Law 86-3, “The Admission Act,” March 18, 1959
- (e) Sections 4321-4370f¹ and 2000bb-1² of title 42, United States Code
- (f) Sections 470-470x-6 of title 16, United States Code (also known as “The National Historic Preservation Act of 1966 (NHPA), as amended”)
- (g) Sections 3001-3013 of title 25, United States Code (also known as “The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), as amended”)
- (h) DoD Instruction 4710.02, “DoD Interactions with Federally-Recognized Tribes,” September 14, 2006
- (i) Public Law 103-150, “Overthrow of Hawaii,” November 23, 1993 (also known as “The Apology Resolution”)

¹ Also known as “The National Environmental Policy Act of 1969, as amended”

² Also known as “The Religious Freedom Restoration Act of 1993, as amended”

ENCLOSURE 2

RESPONSIBILITIES

1. UNDER SECRETARY OF DEFENSE FOR ACQUISITION, TECHNOLOGY AND LOGISTICS (USD(AT&L)). The USD(AT&L) shall establish DoD policy for interactions with federally recognized tribes and requirements for DoD consultation with NHOs.

2. DEPUTY UNDER SECRETARY OF DEFENSE FOR INSTALLATIONS AND ENVIRONMENT (DUSD(I&E)). The DUSD(I&E), under the authority, direction, and control of the USD(AT&L), shall:

- a. Develop policy and guidance for interactions with federally recognized tribes and for consultation with NHOs.
- b. Designate responsibilities and provide procedures for DoD consultation with NHOs.
- c. Enhance DoD Component understanding of NHO issues and concerns through education and training programs and outreach activities.
- d. Assist the DoD Components in identifying requirements of Presidential Memorandums, Executive orders, statutes, and regulations governing DoD consultations with NHOs.
- e. Designate an NHO liaison within the Office of the DUSD(I&E) (ODUSD(I&E)) to coordinate DoD consultation activities.
- f. As requested, assist the DoD Components with consultation with NHOs.

3. HEADS OF THE DoD COMPONENTS WITH CONSULTATION RESPONSIBILITIES TO NHOs. The Heads of the DoD Components with consultation responsibilities to NHOs shall:

- a. Ensure compliance with the applicable requirements of Presidential Memorandums, Executive orders, statutes, and regulations regarding DoD consultations with NHOs, and integrate required consultation activities into mission activities in order to facilitate early and meaningful consultation.
- b. Plan, program, and budget for Presidential Memorandum, Executive order, statutory, and regulatory requirements applicable to consultation with NHOs consistent with DoD guidance and fiscal policies, and within available resources.
- c. Ensure that consultation with NHOs occurs in accordance with Enclosure 3 of this Instruction.

d. Notify the DUSD(I&E) of NHO issues that are controversial, cannot be resolved at the DoD Component level, and have the potential to be elevated to the USD(AT&L) for resolution.

e. Assign NHO liaison responsibilities to staff at the headquarters level to coordinate NHO consultation issues with ODUSD(I&E).

f. Assign a point of contact in Hawaii to ensure that NHO inquiries are channeled to appropriate officials and responded to in a timely manner.

g. Develop consultation procedures and provide cultural communications training for military and civilian personnel with consultation responsibilities.

ENCLOSURE 3

PROCEDURES

1. WHEN TO CONSULT

a. The DoD Components shall consult with NHOs:

(1) When proposing an undertaking that may affect a property or place of traditional religious and/or cultural importance to an NHO.

(2) When receiving notice of or otherwise becoming aware of an inadvertent discovery or planned activity that has resulted or may result in the intentional excavation or inadvertent discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony on Federal lands or lands administered for the benefit of Native Hawaiians pursuant to sections 691-716 of title 8, United States Code (U.S.C.) (also known as “The Hawaiian Homes Commission Act, as amended”) (Reference (c)) and section 4 of Public Law 86-3 (Reference (d)).

(3) When proposing an action that may affect a long term or permanent change in NHO access to a property or place of traditional religious and cultural importance to an NHO.

(4) When proposing an action that may substantially burden a Native Hawaiian’s exercise of religion (as defined in the Glossary).

(5) When proposing an action that may affect a property or place of traditional religious and cultural importance to an NHO or subsistence practices, and for which the DoD Components have an obligation to consult pursuant to sections 4321-4370f of title 42, U.S.C. (also known as “The National Environmental Policy Act of 1969, as amended” (Reference (e))) or any other statute, regulation, or Executive order.

b. The DoD Components shall conduct their consultation activities early enough in the DoD project planning process to allow the information provided to be meaningfully considered by DoD project planners and decision makers.

c. Recognizing that consultation is most effective when conducted in the context of an ongoing relationship, the DoD Components are encouraged to, insofar as practicable, establish and maintain relationships with NHOs separate from consultations related to specific actions. As part of this effort, the DoD Components and NHOs may exchange information related to operational and mission requirements, concerns about stewardship of important cultural resources and culturally-important natural resources, procedures to streamline action-specific consultations, and long-term planning.

2. WHOM TO CONSULT

a. The DoD Components shall make a reasonable and good faith effort to contact and consult with NHOs whose members perform cultural, religious, or subsistence customs and practices in an area that may be affected by a proposed DoD Component activity in Hawaii.

b. As a State of Hawaii organization established to promote the interests of Native Hawaiians, the Office of Hawaiian Affairs (OHA) (see <http://www.oha.org/>) may provide the DoD Components with up-to-date information and recommendations for appropriate contacts relative to a particular proposed action. OHA may also assist the DoD Components with consultation through dissemination of notices and announcements of proposed DoD Component actions that may affect resources of religious and cultural importance to NHOs.

c. As a practical matter, the DoD Components may find it helpful to contact:

(1) Individual Native Hawaiians and others who may have specific knowledge about the history and culture of an area that may have the potential to be adversely affected by a proposed DoD Component action.

(2) Individual Native Hawaiians and others who live near an area that may be affected by a proposed DoD Component activity and who regularly use the area for cultural, religious, or subsistence purposes.

(3) The U.S. Department of Interior, Office of Hawaiian Relations, which maintains an NHO Notification List at <http://www.doi.gov/ohr/nativehawaiians/list.html>.

(4) The Hawaii State Historic Preservation Officer at <http://hawaii.gov/dlnr/hpd/hpgreeting.htm>.

3. HOW TO CONSULT. The DoD Components shall fully integrate, including staff officers at the installation level, the principles and practices of meaningful consultation and communication with NHOs by:

a. Providing interested NHOs an opportunity to participate in pre-decision consultation that will ensure that NHO concerns are given due consideration whenever a DoD Component proposes an action that may affect historic properties or places of traditional religious and cultural importance to an NHO as defined by sections 470-470x-6 of title 16, U.S.C. (also known and hereinafter referred to as “The National Historic Preservation Act of 1966 (NHPA), as amended” (Reference (f))).

b. Considering the advice and recommendations of OHA to facilitate effective consultation between NHOs and DoD Components, with the understanding that no single NHO is likely to represent the interests of all NHOs.

c. Consulting in good faith, whenever a DoD Component proposes an action that may adversely affect resources of traditional religious or cultural importance to NHOs, and for which the DoD Components have an obligation to consult under any Presidential Memorandum, statute, regulation, or Executive order.

d. Initiating and maintaining effective communication with NHOs using tools and techniques designed to facilitate greater understanding and participation.

e. Providing continuity by ensuring new commanders are provided, as soon as possible, information regarding existing written agreements between the installation and NHOs, points of contact, and NHO areas of special interest concerning installation activities.

f. Recognizing the importance of improving communication between the DoD Components and NHOs by establishing a process for outreach regarding DoD activities that may have an effect on a property or place of traditional religious and cultural importance to an NHO or subsistence practices on each island to foster a positive relationship between the DoD Components in Hawaii and NHOs.

g. Involving the Hawaii State Historic Preservation Officer in consultations in accordance with NHPA, and, with respect to sections 3001-3013 of title 25, U.S.C. (also known and hereinafter referred to as "The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), as amended" (Reference (g))), appropriate Burial Councils.

4. CULTURAL AND NATURAL RESOURCE CONSIDERATIONS. The DoD Components shall recognize and respect the significance that NHOs give to resources of traditional religious and cultural importance by:

a. Undertaking DoD Component actions and managing DoD lands and water resources so as to protect and preserve, to the extent practicable and consistent with the law and operational and readiness requirements, places that NHOs have identified, consistent with law, as being of particular significance to Native Hawaiian traditional religious and/or cultural practices.

b. Enhancing the ability of NHOs to help the DoD Components protect and manage a natural resource that is also a property or place of traditional religious and cultural importance to an NHO on DoD lands, through NHO participation in the development of Integrated Cultural Resource Management Plans (ICRMP).

c. Accommodating, to the extent practicable and consistent with the safety of NHO representatives, military training, security, and readiness requirements, NHO access to a property or place of traditional religious and cultural importance to an NHO for religious or cultural activities.

d. Developing written agreements to the extent practicable, appropriate, or required, among the DoD Components, the Secretary of the Interior, and NHOs to protect confidential information regarding a property or place of traditional religious and cultural importance to an NHO.

e. Developing written agreements, to the extent practicable, appropriate, or required, between the DoD Components and the Hawaii State Historic Preservation Officer, in consultation with NHOs, to address the effects of proposed DoD undertakings on a property or place of traditional religious and cultural importance to an NHO.

ENCLOSURE 4

COMPLIANCE MEASURES OF MERIT

1. POLICY IMPLEMENTATION. The ODUSD(I&E) shall assess the number of DoD Components that have incorporated a process for consultation with NHOs as part of an ICRMP when a property or place of traditional religious and cultural importance to an NHO has been identified.
2. NAGPRA. The ODUSD(I&E) shall assess compliance with NAGPRA in accordance with the compliance measures of merit included in DoDI 4710.02 (Reference (h)).

GLOSSARY

PART I. ABBREVIATIONS AND ACRONYMS

DUSD(I&E)	Deputy Under Secretary of Defense for Installations and Environment
ICRMP	Integrated Cultural Resource Management Plans
NAGPRA	Native American Graves Protection and Repatriation Act of 1990
NHOs	Native Hawaiian Organizations
NHPA	National Historic Preservation Act of 1966
ODUSD(I&E)	Office of the Deputy Under Secretary of Defense for Installations and Environment
OHA	Office of Hawaiian Affairs
U.S.C.	United States Code
USD(AT&L)	Under Secretary of Defense for Acquisition, Technology and Logistics

PART II. DEFINITIONS

Unless otherwise noted, these terms and their definitions are for the purpose of this Instruction.

consultation. Seeking, discussing, and considering the views of other participants and, when feasible, seeking a mutually acceptable understanding regarding the matters at hand. As appropriate to the circumstances, consultation may include, but is not limited to, the exchange of written communications, face-to-face discussions, and telephonic or other means of exchanging information and ideas.

cultural patrimony. Defined in section 2(3)(D) of Reference (g).

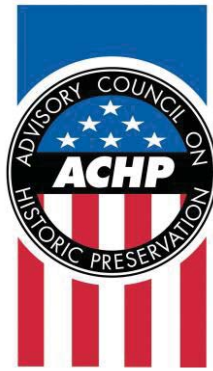
culturally affiliated. Defined in section 2(2) of Reference (g).

exercise of religion. Defined in section 2000bb-1 of Reference (e) (also known as “The Religious Freedom Restoration Act of 1993, as amended”).

human remains, funerary objects, sacred objects, or objects of cultural patrimony. Defined in Reference (g).

Native Hawaiian. Defined in Public Law 103-150 (also known as “The Apology Resolution” (Reference (i))).

NHOs. Organizations that serve and represent the interests of Native Hawaiians have a primary and stated purpose of providing services to Native Hawaiians, and have expertise in Native Hawaiian affairs. Pursuant to NHPA and NAGPRA, NHOs include OHA and Hui Malama I Na Kupuna ‘O Hawai’I Nei (see <http://huimalama.tripod.com/>). The DoD Components may identify any other organization as an NHO if they determine that the organization meets the criteria in this definition.



Preserving America's Heritage

CONSULTATION WITH
NATIVE HAWAIIAN ORGANIZATIONS
IN THE SECTION 106 REVIEW PROCESS:
A HANDBOOK

June 2011

An independent federal agency, the Advisory Council on Historic Preservation (ACHP) promotes the preservation, enhancement, and productive use of our nation's historic resources and advises the President and Congress on national historic preservation policy. It also provides a forum for influencing federal activities, programs, and policies that affect historic properties. In addition, the ACHP has a key role in carrying out the Administration's Preserve America initiative.

Milford Wayne Donaldson is chairman of the 23-member council, which is served by a professional staff with offices in Washington, D.C. For more information about the ACHP, contact:

Advisory Council on Historic Preservation
1100 Pennsylvania Avenue NW, Suite 803
Washington, D.C. 20004
Phone: 202-606-8503
Web site: www.achp.gov

Consultation with Native Hawaiian Organizations in the Section 106 Review Process: A Handbook

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I. About This Handbook

Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. Section 470f, requires federal agencies to take into account the effects of their undertakings on historic properties and provide the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on those undertakings. The ACHP has issued the regulations implementing Section 106 (Section 106 regulations), 36 CFR Part 800, “Protection of Historic Properties.” The NHPA requires that, in carrying out the requirements of Section 106, each federal agency must consult with any Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by the agency’s undertakings.

In 2008, the ACHP adopted the *ACHP Policy Statement on the ACHP’s Interaction with Native Hawaiian Organizations*. The policy is intended to set “forth actions the ACHP will take to oversee the implementation of its responsibilities under the NHPA with respect to the role afforded to Native Hawaiian organizations in the NHPA.” The policy includes three principles:

1. The ACHP acknowledges Native Hawaiian traditional cultural knowledge, beliefs, and practices and recognized their value in the understanding and preservation of historic properties in Hawaii;
2. The ACHP commits to working with Native Hawaiian organizations to fully consider the preservation of historic properties of importance to them; and,
3. The ACHP acknowledges the important contributions of Native Hawaiian organizations to the national historic preservation program.

While the policy does not directly apply to other federal agencies, it serves as a model for how federal agencies should interact with Native Hawaiian organizations in meeting their Section 106 responsibilities. At the very least, it serves to inform federal agencies of the ACHP’s position regarding the role of Native Hawaiian organizations in the Section 106 process.

In fulfillment of the commitments in the policy statement, the ACHP offers this handbook as a reference for federal agency staff in Hawaii with responsibility for compliance with Section 106. Native Hawaiian organizations, State Historic Preservation Office (SHPO) staff, and other Section 106 participants may also find this handbook helpful. Readers should have a basic understanding of the Section 106 review process because this document focuses only on Section 106 consultation with Native Hawaiian organizations. It is not a source for understanding the full breadth of Section 106 responsibilities such as consulting with the SHPO or involving the public.

This handbook will be updated periodically by the ACHP when new information is obtained or laws or policies change. Agencies should also supplement this document with their own agency-specific directives, policies, and guidance pertaining to consultation with Native Hawaiian organizations.

In addition, federal agency staff may refer questions about the Section 106 review process, and the requirements to consult with Native Hawaiian organizations, to their agency’s Federal Preservation Officer (FPO).

Finally, agency staff may obtain assistance from the ACHP in understanding and interpreting the requirements of Section 106. For general information on the requirements of Section 106, access the ACHP Web site at <http://www.achp.gov>. For additional questions about Native Hawaiian organization consultation, contact:

Office of Native American Affairs
Advisory Council on Historic Preservation
1100 Pennsylvania Ave., NW
Room 803
Washington, DC 20004
(202) 606-8503

II. Federal Government Consultation with Native Hawaiian organizations

A. Legal Requirements and Directives to Consult with Native Hawaiian organizations

1) Statutes

A number of federal statutes require federal agencies to consult with Native Hawaiian organizations¹. This section will address only those applicable to historic preservation and cultural resource protection. It is useful to be familiar with various statutory requirements not only to ensure compliance, but also to explore opportunities to maximize consultation opportunities. For instance, if a project requires compliance with both Section 106 of the NHPA and the Native American Graves Protection and Repatriation Act (NAGPRA), it may be helpful to carry out consultation in a comprehensive manner. However, consultation under another statute or regulation does not satisfy the consultation requirements under Section 106.

The following are broad summaries of key federal historic preservation and cultural resource protection statutes that require federal agencies to consult with Native Hawaiian organizations or accommodate Native Hawaiian views and practices. This is not an exhaustive list of requirements, nor does it imply that each of these statutes is applicable to each proposed project.

- Amended in 1992, the **National Historic Preservation Act of 1966 (NHPA)** is the basis for Native Hawaiian organization consultation in the Section 106 review process. The two amended sections of NHPA that have a direct bearing on the Section 106 review process are:
 - Section 101(d)(6)(A), which clarifies that properties of religious and cultural significance to Native Hawaiian organizations may be eligible for listing in the National Register of Historic Places; and
 - Section 101(d)(6)(B), which requires that federal agencies, in carrying out their Section 106 responsibilities, consult with any Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking.

The Section 106 regulations incorporate these provisions. Section 106 requires federal agencies to consider the effects of their undertakings on historic properties and to provide the ACHP an opportunity to comment. Also known as the Section 106 review process, it seeks to avoid unnecessary harm to historic properties from such undertakings. The procedure for meeting Section 106 requirements is defined in the Section 106 regulations, 36 CFR Part 800, “Protection of Historic Properties.”²

¹ The NHPA defines a Native Hawaiian organization as “any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians. The term includes, but is not limited to, the Office of Hawaiian Affairs of the State of Hawaii and Hui Malama I Na Kupuna O Hawai’i Nei, an organization incorporated under the laws of the State of Hawaii.” 16 U.S.C. Section 470w(18). The NHPA defines Native Hawaiian as “any individual who is a descendant of the aboriginal people who, prior to 1778, occupied and exercised sovereignty in the area that now constitutes the State of Hawaii.” 16 U.S.C. Section 470w(17).

² Available at <http://www.achp.gov/regs-rev04.pdf>

The Section 106 regulations include both general direction regarding consultation with Native Hawaiian organizations and specific requirements at each stage of the review process. (Section 106 is discussed more fully in the next section, “Consultation with Native Hawaiian organizations under Section 106 of NHPA”).

For more information about the NHPA and the Section 106 regulations, visit www.achp.gov.

Other relevant laws include:

- **The American Indian Religious Freedom Act of 1978 (AIRFA)** establishes the policy of the federal government “to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including, but not limited to, access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites.” For a copy of the act, go to: http://www.nps.gov/history/local-law/FHPL_IndianRelFreAct.pdf.
- **Section 3(c) of the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)** requires federal land-managing agencies to consult with Native Hawaiian organizations prior to the intentional removal or excavation of Native American human remains and other cultural items as defined in NAGPRA from federal lands. For more information, to go: <http://www.nps.gov/history/nagpra>.

In instances where a proposed project that is funded or licensed by a federal agency may cross federal lands, it is the federal land managing agency that is responsible for compliance with NAGPRA. Detailed information about NAGPRA and its implementing regulations is available at the National Park Service (NPS) National NAGPRA Web site.³

Federal agencies should also be aware that Hawaii has state laws regarding historic preservation and the treatment of burials. For more information, go to: <http://hawaii.gov/dlnr/hpd/hphrs.htm>.

³

Available at <http://www.cr.nps.gov/nagpra>

III. Consultation with Native Hawaiian organizations in the Section 106 Process

Consultation means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process. (36 CFR Section 800.16 (f)).

Consultation constitutes more than simply notifying a Native Hawaiian organization about a planned undertaking. The ACHP views consultation as a process of communication that may include written correspondence, meetings, telephone conferences, site visits, and e-mails.

The requirements to consult with Native Hawaiian organizations in the Section 106 review process are derived from the specific language of Section 101(d)(6)(B) of NHPA.

While federal agencies are required to consult with Native Hawaiian organizations at specific steps in the Section 106 review process, the ACHP suggests that agencies approach consultation with flexibility and in a spirit of cooperation. In fact, in its *Policy Statement on the ACHP's Interaction with Native Hawaiian Organizations*, the ACHP states that “the NHPA and the regulations implementing Section 106 of the NHPA, 36 C.F.R. Part 800, set the minimum standards for federal agency interaction with its preservation partners.”

Carrying out the process in the spirit and intent of the NHPA can lead to less adversarial relationships and better historic preservation outcomes. In fact, many Native Hawaiians believe that it is the *kuleana* (responsibility) of federal agencies to protect historic properties. Thus, a collegial or cooperative attitude or approach to the Section 106 process builds trust and good working relationships.

Regulatory Principles and General Directions for Section 106 Native Hawaiian Consultation

The procedures for meeting Section 106 requirements are defined in the Section 106 regulations, “Protection of Historic Properties” (36 CFR Part 800).⁴ Under the NHPA, “historic properties” are defined as those properties that are listed on the National Register of Historic Places, or are eligible for such listing.

The regulations provide both overall direction as well as specific requirements regarding consultation at each step of the Section 106 review process. The Section 106 regulations at 36 CFR Section 800.2(c)(2) outline the following important principles and general directions to federal agencies regarding consultation with Native Hawaiian organizations:

- The agency shall ensure that consultation provides the Native Hawaiian organization a **reasonable** opportunity to identify its concerns about historic properties; advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance to it; articulate its views on the undertaking’s effects on such properties; and participate in the resolution of adverse effects.
- Consultation with Native Hawaiian organizations should commence early in the planning process, in order to identify and discuss relevant preservation issues and plan how to address concerns about confidentiality of information obtained during the consultation process.

⁴

Available at <http://www.achp.gov/regs-rev04.pdf>

- Historic properties of religious and cultural significance to a Native Hawaiian organization may be located on ancestral or ceded lands, e.g. Hawaiian Homelands. For historical reasons, members of a Native Hawaiian organization may now be located on another Hawaiian island or other distant location far away from historic properties that still hold such significance for them. Accordingly, the regulations require that agencies make a *reasonable and good-faith effort*⁵ to identify Native Hawaiian organizations that may attach religious and cultural significance to historic properties that may be affected by the undertaking, even if Native Hawaiian organizations now are located a great distance away from such properties and undertakings.
- A Native Hawaiian organization may enter into an agreement with a federal agency regarding any aspect of that organization's participation in the review process. The agreement may specify a Native Hawaiian organization's geographic area of interest, types of projects about which it wishes to be consulted, or provide the Native Hawaiian organization with additional participation or concurrence in agency decisions under Section 106 provided that no modification is made to the roles of other parties without their consent.

While the Section 106 regulations are fairly prescriptive in nature, they only direct agencies on what to do and at which stages of the process to engage in consultation. They do not direct agencies on exactly how to otherwise carry out consultation. Thus, the following questions and answers are designed to clarify the most common questions and issues regarding consultation with Native Hawaiian organizations under the Section 106 review process.

⁵ Tips on how to fulfill this requirement are provided under the heading "How do I identify Native Hawaiian organizations that must be invited to consult," on page 11 of this handbook.

IV. General Questions and Answers

The following list of questions is meant to address general issues that commonly arise in the Section 106 review process, typically before an agency begins the review process or very early in the process. Section V of this handbook addresses questions that might arise at each step of the Section 106 review process.

When are federal agencies required to consult with Native Hawaiian organizations?

The **1992 amendments** to the NHPA require federal agencies, in carrying out the Section 106 review process, to consult with Native Hawaiian organizations when a federal undertaking may affect historic properties of traditional religious and cultural significance to them. An “undertaking” means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; or those requiring a federal permit, license, or approval. This requirement applies to all undertakings regardless of where they are located.

The Section 106 regulations, 36 CFR Part 800, identify the steps in the Section 106 process when consultation must take place. It is important to keep in mind that consultation should take place early in project planning when the widest possible range of alternatives still exists.

It is also important to understand that Native Hawaiian organizations are not the “general public” for purposes of the NHPA and the Section 106 process. Federal agencies have a statutory, affirmative responsibility to consult with Native Hawaiian organizations, and **this responsibility cannot be satisfied through public notices or public meetings**. NHOs can certainly participate in public meetings but such participation is not a substitute for the consultation required under the NHPA and laid out in the Section 106 regulations.

Which Native Hawaiian organizations must be consulted?

Native Hawaiian organizations that attach religious and cultural significance to historic properties that may be affected by undertakings must be consulted. Federal agencies must make “a reasonable and good faith” effort⁶ to identify each and every such Native Hawaiian organization and invite them to be consulting parties in the Section 106 review process.

This includes Native Hawaiian organizations that live nearby as well as those that no longer reside in or near the project area but that, for example, may still have ancestral ties to that area. It is also possible that a Native Hawaiian organization attaches religious and cultural significance to a historic property on another island. For example, Mauna Kea, on the island of Hawaii, is widely regarded as a place of religious and cultural significance to many individual Native Hawaiians and Native Hawaiian organizations throughout the state of Hawaii. Accordingly, a proposed undertaking that might affect Mauna Kea could necessitate consultation with Native Hawaiian organizations throughout the state.

If a Native Hawaiian organization has not been invited by the agency to consult, **that organization may request in writing to be a consulting party**. The NHPA and the Section 106 regulations require that the agency grant consulting party status to any Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by the undertaking.

⁶ Tips on how to fulfill this requirement are provided under the heading “How do I identify Native Hawaiian organizations that must be invited to consult,” on page 11 of this handbook.

Must a Native Hawaiian organization demonstrate its affiliation to an area to be considered a consulting party in the Section 106 process?

No. A Native Hawaiian organization does not have to demonstrate its cultural affiliation in order to be a consulting party in the Section 106 process. The term “cultural affiliation” is used in the Native American Graves Protection and Repatriation Act and has no relevance in the Section 106 review process. In fact, the NHPA at Section 101(d)(6)(B) states that “in carrying out its responsibilities under section 106 of this Act, a Federal agency shall consult with any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to properties” that are eligible for inclusion in the National Register. Therefore, any Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking *must* be invited by the federal agency to participate in the Section 106 consultation process.

What should a federal agency do if one NHO will not participate in the consultation process with another NHO or demands that the agency not consult with another NHO?

It is important to remember that the NHPA requires a federal agency to consult with any Native Hawaiian organization that attaches religious and cultural significance to a historic property. Therefore, the views of one Native Hawaiian organization regarding the participation of another Native Hawaiian organization have no bearing on a federal agency’s obligation to extend an invitation to consult.

If such conflicts arise in the Section 106 process, the federal agency should approach consultation with flexibility. For instance, it may be necessary to conduct meetings or teleconferences separately with each consulting party.

What are appropriate consultation methods for individual undertakings?

The consultation process must provide a Native Hawaiian organization a reasonable opportunity to identify its concerns about historic properties; advise on the identification and evaluation of historic properties, including those of religious and cultural significance to it; articulate views on the undertaking’s effects on such properties; and participate in the resolution of adverse effects. (See 36 CFR Section 800.2(c)(2)(ii)(A)).

Appropriate consultation can take many forms or combine more than one type of interaction and should be commensurate with the nature of the undertaking and the properties which may be affected. For instance, face-to-face meetings or on-site visits may be the most practical way to conduct consultation. However, there is no specific way in which consultation must be conducted beyond the procedural specifics provided in the Section 106 regulations. In all cases, however, consultation should be approached with flexibility that respects the Native Hawaiian organization’s role within the overall project planning process and facilitates its full participation.

Documentation of consultation is important because it allows consulting parties to more accurately track the stages of the Section 106 process. Federal agencies should document all efforts to initiate consultation with Native Hawaiian organizations, as well as documenting the consultation process once it has begun. Such documentation, in the form of correspondence, telephone logs, e-mails, etc., should be included in the agency’s official Section 106 record. Agencies should also keep notes so that the consultation record documents the *content* of consultation meetings, site visits, and phone calls in addition to information about dates and who participated. Doing so allows agencies and consulting parties to review proceedings and correct any errors or omissions, thus facilitating better overall

communication. Keeping information confidential can present unique challenges (see Section V(B)(4) of this handbook).

Finally, a federal agency and a Native Hawaiian organization may enter into an agreement in accordance with the Section 106 regulations at 36 CFR Section 800.2(c)(2)(ii)(E) regarding how Section 106 consultation will take place. These are not project-specific agreements but, instead, are meant to address Section 106 consultation more broadly. Such agreements can cover all potential agency undertakings, or apply only to a specific undertaking. They can establish protocols for carrying out consultation, including how the agency will address concerns about confidentiality of sensitive information. Such agreements can cover all aspects of the Section 106 process, provided that no modification is made to the roles of other parties to the Section 106 process without their consent. Determining the types of undertakings and the potential geographic project areas within which a Native Hawaiian organization wants to be consulted, and how that consultation will take place can lead to tremendous efficiencies for both the federal agency and the Native Hawaiian organization. Filing such agreements with both the Hawaii SHPO and the ACHP is required per 36 CFR Section 800.2(c)(2)(ii)(E), and can eliminate questions about consultation with a Native Hawaiian organization when either the SHPO or the ACHP is reviewing a proposed undertaking. For more information about these types of agreements, see Section VI on Consultation Tools.

Can a federal agency pay for expenses that facilitate consultation with Native Hawaiian organizations?

Yes. The NHPA authorizes such expenditures, at 16 U.S.C. Section 470h-2(g), and the ACHP encourages federal agencies to take the steps necessary to facilitate Native Hawaiian organization participation at all stages of the Section 106 process. These steps may range from scheduling meetings in places and at times that are convenient for Native Hawaiian organizations, to paying travel expenses for participating Native Hawaiian organization representatives. Indeed, agencies are strongly encouraged to use available resources to help overcome financial impediments to effective Native Hawaiian organization participation in the Section 106 process. However, federal agencies should not expect to pay a fee to any consulting party to provide comments or concurrence in an agency finding or determination.

Can a federal agency pay a fee to a Native Hawaiian organization for services provided in the Section 106 process?

Yes. However, it should be noted that while the ACHP encourages agencies to utilize their resources to facilitate working with Native Hawaiian organizations, the NHPA or the ACHP's regulations do not require an agency or an applicant to pay for any form of Native Hawaiian organization involvement.

However, during the identification and evaluation phase of the Section 106 process, when the agency or applicant is carrying out its duty to identify historic properties that may be significant to a Native Hawaiian organization, it might ask a Native Hawaiian organization for specific information and documentation regarding the location, nature, and condition of individual sites, or even request that a survey be conducted by the Native Hawaiian organization. In doing so, the agency or applicant is essentially asking the Native Hawaiian organization to fulfill the duties of the agency in a role similar to that of a consultant or contractor. In such cases, the Native Hawaiian organization would be justified in requesting payment for its services, just as is appropriate for any other contractor. **Since Native Hawaiian organizations are a recognized source of information regarding historic properties of religious and cultural significance to them, federal agencies should reasonably expect to pay for work carried out by Native Hawaiian organizations on behalf of the agency.** The agency or applicant is free to refuse just as it may refuse to pay for an archaeological consultant, but the agency still retains the responsibility for

obtaining the necessary information for the identification of historic properties, the evaluation of their National Register eligibility, and the assessment of effects on those historic properties, through reasonable methods.

It should be noted that reimbursing any party, including Native Hawaiian organizations, for work they perform on behalf of the federal agency is not reimbursement for consultation. Consulting parties should not be expected to be reimbursed for participating in the consultation process.

What specific activities might be reimbursed?

Examples of reimbursable costs may include those costs associated with expert consultants to identify and evaluate historic properties as outlined in the immediately preceding answer. This may include field visits to provide information about specific places or sites, monitoring activities, research associated with historical investigation, documentation production costs, and related travel expenses.

Can Native Hawaiian organizations, as well as federal agencies, request ACHP involvement in the Section 106 review process?

Yes. Any party, including Native Hawaiian organizations, may request that the ACHP review the substance of any federal agency's finding, determination, or decision or the adequacy of an agency's compliance with the Section 106 regulations.

A Native Hawaiian organization may request that the ACHP enter the Section 106 review process for any number of reasons, including concerns about the identification, evaluation, or assessment of effects on historic properties of religious and cultural significance to it. It may also request ACHP involvement in the resolution of adverse effects or where there are questions about policy, interpretation, or precedent under Section 106. The ACHP has discretion in determining whether to become involved in the process whether upon request or its own initiative.

Does the ACHP have a policy on the treatment of Native American burials that are located on state or private lands (and thus not subject to the disinterment provisions of NAGPRA)?

Yes. On February 23, 2007, the members of the ACHP unanimously adopted its revised "Policy Statement Regarding the Treatment of Burial Sites, Human Remains and Funerary Objects." This policy is designed to guide federal agencies in making decisions about the identification and treatment of burial sites, human remains, and funerary objects encountered in the Section 106 process in various instances including those where federal or state law does not prescribe a course of action. The policy is not exclusively directed toward Native American burials, human remains or funerary objects, but those would be included under the policy. In accordance with Section 106, the policy does not recommend a specific outcome from the consultation process, but rather focuses on issues and perspectives that federal agencies ought to consider when making their Section 106 decisions. The policy is available at <http://www.achp.gov/docs/hrpolicy0207.pdf>.

Federal agencies should be aware there is a state law in Hawaii regarding burials. For more information, go to <http://hawaii.gov/dlnr/hpd>.

V. Consultation with Native Hawaiian Organizations for Proposed Undertakings

As noted earlier in the handbook, under the NHPA, consultation with Native Hawaiian organizations is required for *all* federal undertakings, regardless of whether the undertaking's Area of Potential Effect (APE) includes federal, state, or private lands, so long as the undertaking may affect historic properties of religious and cultural significance to a Native Hawaiian organization. Consultation should begin early in project planning and continue throughout the Section 106 process when properties of religious and cultural significance to Native Hawaiian organizations may be affected.

The organization of this section of the handbook corresponds with the Section 106 review process's four steps of initiation, identification, assessment, and resolution.

A. Initiation of the Section 106 Process

1) How would I know if historic properties of traditional religious and cultural significance to Native Hawaiian organizations may be affected by the proposed undertaking?

Unless such properties have already been identified and the information is readily available, you probably will not know in advance. As with any undertaking that might affect historic properties, you must determine whether the proposed undertaking is generically the kind that might affect historic properties assuming such properties are present. Therefore, if the undertaking is the kind of action that might affect places such as archaeological sites, burial grounds, sacred landscapes or features, or ceremonial areas, then you must identify Native Hawaiian organizations that might attach significance to such places and invite them to participate in the process. Please note that this list of examples is not all-inclusive. It is through consultation with Native Hawaiian organizations themselves that such properties can be properly identified and evaluated.

2) How do I identify the Native Hawaiian organizations that must be invited to consult?

Identification of Native Hawaiian organizations that must be invited to consult could include a number of initiatives. For instance, it might be useful to check with other federal agencies and their cultural resource specialists for a list of Native Hawaiian organizations with whom they have consulted in past Section 106 reviews. The SHPO and the Office of Hawaiian Affairs (OHA)⁷ might also be able to suggest which Native Hawaiian organizations to contact. Other sources for such information may include ethnographies, local histories, experts at local universities, oral accounts, and, of course, the Native Hawaiian organizations themselves. Do not hesitate to ask about others that might also be interested in participating in consultation. Finally, the Department of the Interior's Office of Hawaiian Relations maintains a list of Native Hawaiian organizations at <http://www.doi.gov/ohr/nativehawaiians/nhol.cfm>.

It may also be helpful to publish notices in local newspapers about the initiation of the Section 106 review process and the opportunity for Native Hawaiian organizations to participate in the consultation. For major or controversial projects, it might be advisable to work with the Office of Hawaiian Affairs to include information in its radio programs.

⁷ Founded in 1980, OHA has functioned operationally as both a government agency with a strong degree of autonomy, and as a trust, both to provide for a better life and future for all Hawaiians.

Keep in mind that identification of Native Hawaiian organizations with ancestral connections to an area is not a “one stop shopping” endeavor in which any single source can be depended upon to fulfill the agency’s legal responsibilities. Agency officials should bear in mind that while Internet sources are convenient and can be useful, their informational content may be incomplete.

Once the agency has identified Native Hawaiian organizations that may attach religious and cultural significance to any historic properties that may exist in the APE, the agency must invite them to consult.

Finally, it is important to remember that documentary or other sources of information that do not appear to support a Native Hawaiian organization’s assertions should not be used to deny the organization the opportunity to participate in consultation. A common misunderstanding is that a Native Hawaiian organization needs to document its ties to historic properties in the area of the undertaking. Instead, the NHPA requires agencies to consult with any Native Hawaiian organization that attaches religious and cultural significance to a historic property. It stands to reason that the best source for determining what historic properties have significance for a Native Hawaiian organization would be the experts designated by the Native Hawaiian organization to determine its own interest. Such experts might include elders, traditional practitioners, or Native Hawaiian historians. The Native Hawaiian organization will designate the appropriate representative(s) to represent its interests in the Section 106 consultation process.

4) Who initiates the consultation process with a Native Hawaiian organization?

Consultation with a Native Hawaiian organization should be initiated by the agency official⁸ through a letter. It is helpful to follow up such correspondence with direct telephone communication to ensure the letter has been received.

If the agency official has correspondence from the Native Hawaiian organization designating a person or position within the organization to act on its behalf in the Section 106 process, the agency may initiate consultation accordingly. It is good practice, in this instance, to send a copy of all correspondence to the organization’s leadership as well.

5) Can applicants for federal permits or contractors hired by the agency initiate and carry out Native Hawaiian organization consultation?

Yes. The Section 106 regulations at 36 CFR Section 800.2(c)(4) allow federal agencies to authorize an applicant or group of applicants to initiate consultation with the SHPO and other consulting parties, including Native Hawaiian organizations. However, this is a formal authorization and requires notification from the federal agency to the SHPO. The federal agency remains responsible for all findings and determinations charged to the agency in the review process.

The Section 106 regulations allow for federal agencies to use the services of consultants or designees to prepare information, analyses, and recommendations, but not to initiate and carry out consultation.

6) What are the consultation responsibilities for undertakings that involve more than one federal agency?

The Section 106 regulations at 36 CFR Section 800.2 (a)(2) provide that, if more than one federal agency is involved in an undertaking, some or all of the agencies may designate a lead federal agency who will

⁸ As defined in Section 800.2(a) of the ACHP regulations, an agency official is one who has jurisdiction over the undertaking and takes legal and financial responsibility for Section 106 compliance.

act on their behalf to fulfill their collective responsibilities under Section 106, including consultation with Native Hawaiian organizations. Those federal agencies that do not designate a lead agency remain individually responsible for their Section 106 compliance; thus, they each would need to initiate and carry out Section 106 consultation with Native Hawaiian organizations for the undertaking.

B. Identification of Historic Properties

1) Does the federal agency consult with Native Hawaiian organizations to carry out identification and evaluation of historic properties?

Yes, the agency consults with Native Hawaiian organizations to plan and carry out identification efforts and to evaluate the National Register eligibility of identified properties for proposed undertakings.

Many agencies assume that agency or contract archaeologists can identify which properties are of significance to Native Hawaiian organizations when they conduct archaeological surveys. However, unless an archaeologist has been specifically authorized by a Native Hawaiian organization to speak on its behalf on the subject, it should not be assumed that the archaeologist possesses the appropriate expertise to determine what properties are or are not of significance to a Native Hawaiian organization. The appropriate individual to carry out such a determination is the representative designated by the Native Hawaiian organization for this purpose. Identification efforts may include site visits to assist in identifying these types of properties.

The Section 106 regulations state that the agency official shall acknowledge that Native Hawaiian organizations possess special expertise in assessing the National Register eligibility of historic properties that may possess religious and cultural significance to them (36 CFR § 800.4(c)(1)).

The agency must provide Native Hawaiian organizations with the same information that is provided to the SHPO during consultation, including information on buildings and other standing structures that may be affected by the proposed undertaking. A federal agency should not presume to know what is of significance to a particular Native Hawaiian organization.

2) How can I identify historic properties that may possess traditional religious and cultural significance to Native Hawaiian organizations and determine their National Register eligibility?

The identification of those historic properties that are of traditional religious and cultural significance to a Native Hawaiian organization must be made by that Native Hawaiian organization's designated representative as part of the Section 106 consultation process.

The National Register eligibility of such places is determined in the same manner as any potentially eligible property, by applying the criteria of eligibility.

3) What are Traditional Cultural Properties?

The term "Traditional Cultural Property" (TCP) is used in the National Park Service's (NPS) Bulletin 38, entitled *"Guidelines for Evaluating and Documenting Traditional Cultural Properties."*⁹ That bulletin explains how to identify a property "that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that a) are rooted in that community's history, and b) are important in maintaining the continuing cultural identity of the community." For a

⁹

Available at <http://www.cr.nps.gov/nr/publications/bulletins/nrb38/nrb38%20introduction.htm>

TCP to be found eligible for the National Register, it must meet the existing National Register criteria for eligibility as a building, site, structure, object, or district. TCPs are defined only in NPS guidance and are not referenced in any statute or regulation, and **refer to places of importance to any community, not just to Native Hawaiian organizations.** Therefore, this terminology may be used when an agency is considering whether any property is eligible for the National Register.

Within the Section 106 process, the appropriate terminology for National Register listed or eligible sites of importance to Native Hawaiian organizations is “**historic property of religious and cultural significance to Native Hawaiian organizations.**” Unlike the term TCP, this phrase appears in the NHPA and the Section 106 regulations. **It applies (strictly) to Native Hawaiian sites, unlike the term TCP.** Furthermore, Section 101(d)(6)(A) of the NHPA reminds agencies that properties of religious and cultural significance to Native Hawaiian organizations may be eligible for the National Register. Thus, it is not necessary to use the term TCP when considering whether a site with significance to a Native Hawaiian organization is eligible for the National Register as part of the Section 106 process. The NPS Bulletin 38 guidelines are helpful, however, in providing an overview of how National Register criteria are applied.

Another issue with the term TCP is that Bulletin 38 has sometimes been interpreted as requiring a Native Hawaiian organization to demonstrate continual use of a site in order for it to be considered a TCP in accordance with Bulletin 38. This could be problematic in that Native Hawaiian use of a historic property may be dictated by cyclical religious or cultural timeframes that do not comport with mainstream conceptions of “continuous” use; while in other cases, Native Hawaiian organizations may have been denied access to historic properties of religious and cultural significance to them. This is particularly true for historic properties located within military installations or on private property. It is important to note that under the NHPA and the Section 106 regulations, **the determination of a historic property’s religious and cultural significance to a Native Hawaiian organization is not tied to continual or physical use of the property. Also, continual use is not a requirement for National Register eligibility.**

4) What procedures should be followed if a Native Hawaiian organization does not want to divulge information to the federal agency regarding places of traditional religious and cultural significance?

Native Hawaiian organizations may have internal prohibitions against or cultural protocols about the disclosure of certain information about traditional religious and cultural properties. The ACHP’s regulations at 36 CFR Section 800.4(b)(i) state, in part, that “[t]he agency official shall take into account any confidentiality concerns raised by ... Native Hawaiian organizations during the identification process.”

The NHPA and the Section 106 regulations also provide a vehicle for protecting information that a Native Hawaiian organization has disclosed for the purpose of identification and evaluation in the Section 106 process. Section 304 of the NHPA (16 U.S.C. 470w-3(a)) and the regulations at 36 CFR Section 800.11(c)(1) provide that an agency, after consultation with the Secretary of the Interior, “*shall* withhold from disclosure to the public” information about the location, character, or ownership of a historic property when the agency and the Secretary determine that the disclosure of such information may cause a significant invasion of privacy; risk harm to the historic property; or, impede the use of a traditional religious site by practitioners. After such a determination, the Secretary of the Interior will determine who, if anyone, may have access to the information for purposes of the NHPA.

One important caveat: the Section 304 confidentiality provisions only apply to properties that have been determined eligible for the National Register. Thus, it is possible that information disclosed prior to an eligibility determination may not be protected. Therefore, the ACHP suggests that agencies and Native Hawaiian organizations contact National Register staff for guidance regarding the amount of information and detail needed to make a determination of eligibility when such information may be at risk of disclosure. It may be possible for a Native Hawaiian organization to share just enough information for the agency to identify the existence of a site and make a determination of eligibility without compromising the site or the Native Hawaiian organization's beliefs. Such information might include general aspects of the historic property's attributes, i.e., that an important yearly ceremony takes place in a certain general location, that quiet is required in an area where spirits reside, that visual impacts will impede the ability to properly perform a required ritual, or that important ceremonial harvesting activities must occur at a particular place, time, or under certain conditions. However, if there are questions about the adequacy of such information in making determinations of eligibility, the National Register staff should be consulted.

Issues of confidentiality and sensitivity of information require flexibility and cooperation among the consulting parties. There may be situations where a Native Hawaiian organization is only willing to share information with the federal agency and not with the other non-federal consulting parties. This can challenge the traditional Section 106 process where the federal agency also consults with the SHPO to determine the National Register eligibility of properties. In such cases, it is recommended that the agency promptly talk with the ACHP or the National Register staff about how to resolve such a situation.

5) Is the federal agency required to verify a Native Hawaiian organization's determination of significance with archaeological or ethnographic evidence before making a National Register eligibility determination?

No. The agency is not required to verify a Native Hawaiian organization's determination that a historic property is of religious and cultural significance to it. However, the fact that a property may be of religious and cultural significance to a Native Hawaiian organization does not necessarily mean that the property is eligible for the National Register. The ACHP regulations at 36 CFR 800.4(c)(1) do state, in part, that "[t]he agency official shall acknowledge that Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them." Additionally, traditional knowledge and oral histories are sources of information which federal agencies should consider in assessing the National Register eligibility of properties. For additional guidance on making eligibility determinations, the agency should consult with the staff of the National Register.¹⁰

6) Does the federal agency need to obtain a Native Hawaiian organization's concurrence with the agency's determination of National Register eligibility?

No. The agency does not need to obtain a Native Hawaiian organization's concurrence with eligibility determinations. The agency only needs the concurrence of the SHPO for a determination and, absent such concurrence, the matter goes to the Keeper of the National Register for final resolution. The federal agency must acknowledge, however, that Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may be of significance to them, as required in the Section 106 regulations at 36 CFR Section 800.4(c)(1).

¹⁰ Contact information for National Register headquarters in Washington, D.C., available at <http://www.cr.nps.gov/nr/about.htm>

Also, if a Native Hawaiian organization disagrees with the federal agency's determination of eligibility, the Native Hawaiian organization may, per the Section 106 regulations at 36 CFR 800.4(c)(2), ask the ACHP to request that the federal agency obtain a formal eligibility determination from the Keeper of the National Register.

7) Once the required identification and evaluation efforts are completed, does the federal agency need to consult with a Native Hawaiian organization in reaching a finding that there are no historic properties that will be affected by the undertaking, or that there are historic properties present but the undertaking will have no effect on them?

Despite the requirements for Native Hawaiian organization consultation up to this point in the process, the agency does not have to consult with a Native Hawaiian organization in reaching a finding that there are no historic properties present, or that the proposed undertaking will not affect an identified historic property. However, the agency must provide notification and documentation supporting its finding on these questions to any consulting Native Hawaiian organization.

If a consulting Native Hawaiian organization disagrees with the agency's finding, it should immediately contact the ACHP and request that the ACHP object to the finding, per 36 CFR 800.4(d)(1)(iii). If, upon the review of the finding, the ACHP also objects to the finding, the ACHP may provide its opinion to the agency official, and, if the ACHP determines the issue warrants it, to the head of the agency. The regulations stipulate that if the ACHP wants to object to a no historic properties affected finding on its own initiative (as opposed to in response to a SHPO unresolved objection), it must do so within 30 days of the agency's issuance of that finding.

C. Assessment of Adverse Effects

1) Which parties does the federal agency consult with to apply the criteria of adverse effect to historic properties within the APE?

The agency consults with the SHPO and Native Hawaiian organizations in applying the criteria of adverse effect to historic properties within the APE. Again, federal agencies must recognize the special expertise of Native Hawaiian organizations in assessing the eligibility of properties of religious and cultural significance to them per 36 CFR 800.4(c)(1), and 36 CFR 800.5(a) requires that agencies apply the criteria of adverse effect in consultation with Native Hawaiian organizations. Therefore, in assessing how a proposed undertaking might affect historic properties of religious and cultural significance to Native Hawaiian organizations, federal agencies need to consider the views of those Native Hawaiian organizations.

2) When proposing a finding of "no adverse effect," does the federal agency consult with Native Hawaiian organizations?

No. The agency consults with the SHPO in proposing a finding of "no adverse effect," but notifies consulting parties such as Native Hawaiian organizations, and provides them with documentation supporting that finding. The federal agency is encouraged, but not required, to seek the concurrence of Native Hawaiian organizations that attach religious and cultural significance to the historic property subject to the finding.

3) What happens if a Native Hawaiian organization disagrees with a finding of "no adverse effect"?

If a consulting Native Hawaiian organization disagrees with a proposed agency finding of “no adverse effect,” it must specify the reasons for its objection in writing within 30 days of receipt of the agency’s issuance of the proposed finding. Once a timely written objection is received, the agency must either consult with the objecting party to resolve the disagreement or request ACHP review of the “no adverse effect” finding, per 36 CFR 800.5(c)(2)(i). The agency must concurrently notify all other consulting parties that it has requested ACHP review of the finding.

Consulting Native Hawaiian organizations can make a direct request to the ACHP to review the finding, specifying, in writing and within the 30 day review period, the reasons for its objection, per 36 CFR 800.5(c)(2)(iii).

After review of the objection, the ACHP may provide its opinion to the agency official, and, if the ACHP determines the issue warrants it, to the head of the agency. The regulations stipulate that if the ACHP wants to object to a finding on its own initiative (as opposed to in response to a consulting party unresolved objection), it must do so within 30 days of receipt of the agency’s issuance of that finding.

D. Resolution of Adverse Effects

1) Which parties does the federal agency consult with to develop and evaluate alternatives or modifications to the undertakings to avoid, minimize, or mitigate adverse effects?

The agency consults with the SHPO, Native Hawaiian organizations, and other consulting parties at this phase of the Section 106 process. The agency must provide project documentation to all consulting parties and invite the ACHP into consultation. Any consulting party may request ACHP participation in consultation to facilitate the resolution of adverse effects.

In fact, the Section 106 regulations at 36 CFR Section 800.2(b) stipulate that the ACHP may enter into the consultation at any point in the Section 106 process without invitation when it determines that its involvement is necessary to ensure that the purposes of Section 106 are met. As specified in Appendix A to 36 CFR Part 800, the ACHP may elect to enter the consultation if, among other things, an undertaking presents issues of concern to Native Hawaiian organizations.

2) What happens if agreement is reached on how to resolve adverse effects?

If agreement is reached, the agency, SHPO and consulting parties, including Native Hawaiian organizations, develop a Section 106 Memorandum of Agreement (MOA) or Programmatic Agreement (PA) outlining how the adverse effects will be addressed.

In order to go into effect, the agreement must be signed by the agency, SHPO, and the ACHP if it is participating in the consultation.

3) Is the federal agency obligated to invite a Native Hawaiian organization to be a signatory or a concurring party to an MOA or PA?

No. The agency may, but is not required to, invite a Native Hawaiian organization to become a signatory or concurring party. A signatory to an MOA or PA possesses the same rights with regard to seeking amendments to or terminating the agreement as all other signatories, which include the agency official, the SHPO, and the ACHP, if participating. Those that sign as a concurring party do not have such rights to amend or terminate the MOA or PA. Refusal by Native Hawaiian organization to become a signatory or concurring party to an MOA or PA, however, does not invalidate it. Certainly, agencies are

encouraged to invite Native Hawaiian organizations that attach religious and cultural significance to affected historic properties to sign the agreement. If a Native Hawaiian organization is assuming review or other responsibilities under the MOA or PA, the agency should consider inviting the Native Hawaiian organization to become a signatory.

4) What happens if agreement is not reached on how to resolve adverse effects?

If agreement is not reached, the agency, the SHPO, or the ACHP (if participating), may terminate consultation. Other consulting parties, including Native Hawaiian organizations, may decline to participate, but they cannot terminate consultation. After consultation is terminated, the ACHP prepares its formal comments to the head of the agency, who must consider and respond to the ACHP's comments before reaching a final decision on the undertaking. Per the Section 106 regulations at 36 CFR Section 800.7 (c), the ACHP must provide an opportunity for the agency, all consulting parties, and the public to provide their views to the ACHP during the time in which the comments are being developed. When the ACHP issues comments, it means the ACHP membership issues the comments, not the ACHP staff. In addition to providing the comments to the head of the agency, the ACHP provides copies of those comments to each of the consulting parties. Once the head of the agency has received the ACHP's comments, he or she is required to prepare a summary of his or her final decision regarding the proposed undertaking that contains both the rationale for its decision as well as evidence that it had considered the ACHP's comments when making that decision. In addition, the agency must provide copies of this summary to all consulting parties.

VI. Consultation Tools

While the Section 106 regulations direct agencies to consult with Native Hawaiian organizations on proposed undertakings, the regulations do not offer guidance on how to carry out such consultation. The following are some examples of ways in which consultation could be achieved and improved.

Agreements

The Section 106 regulations at 36 CFR Section 800.2(c)(2)(ii)(E) provide for agreements between federal agencies and Native Hawaiian organizations that tailor how consultation will be carried out. Such agreements are not project-specific but, instead, are more general and are focused on the relationship between an agency and a Native Hawaiian organization. An agreement can cover all aspects of the consultation process and could grant a Native Hawaiian organization additional rights to participate or concur in agency decisions in the Section 106 process beyond those specified in the regulations. The only restriction on the scope of such agreements is that the role of other parties in the process may not be modified without their consent.

Such agreements can be a means not only to ensure that consultation would be carried out to the satisfaction of both parties but also as a workload management tool. Agreements can outline the geographical areas within which a Native Hawaiian organization has an interest.

The negotiation process to develop an agreement with a Native Hawaiian organization does not require participation by any other parties outside of the agency (there may be other entities within the agency, such as the agency's office of legal counsel, that must participate). The only requirements for such agreements under the ACHP's regulations are that:

- the role of other parties is not modified without their consent; and
- the agreement is filed with both the ACHP and the SHPO.

Summits, Listening Sessions, and Meetings

Some agencies have hosted summits with Indian tribes and continue to do so on a regular basis. These meetings provide a means for agencies to share information about proposed undertakings and for Indian tribes to voice their views and talk with agency personnel. They also serve to develop trust and build relationships. Federal agencies in Hawaii could certainly host summits with Native Hawaiian organizations and change the dynamic from one of consultation on specific projects to programmatic discussions.

Listening sessions are another very useful tool for improving the relationship between agencies and Native Hawaiian organizations. The ACHP has hosted listening sessions in Hawaii and based, in part, on the feedback it received, decided that a policy regarding its interaction with Native Hawaiian organizations was called for.

Some agencies also host annual or regular meetings with Indian tribes to ensure that the consultation relationships are working and to address any outstanding issues. These gatherings are separate from Section 106 consultation meetings. They provide a forum for airing more general concerns, a means for recharging the relationship, and an opportunity to meet new agency personnel and tribal representatives. Again, these kinds of meetings would be especially helpful in Hawaii.

Guidance Materials and Training

Training is extremely useful in that it ensures that both federal agencies and Native Hawaiian organizations have a common understanding of legal requirements, organizational structures, decision-making, and other important mechanics of the consultation relationship. Training can also address cultural issues to help foster greater mutual understanding. Some agencies have hosted joint training sessions, while others require new personnel to receive training specific to their new duties. For instance, the ACHP has an internal requirement to train all staff and members regarding tribal and Native Hawaiian consultation within the Section 106 process.

VII. Principles and Tips for Successful Consultation

The key to success in any consultation relationship is building trust, having common goals, and remaining flexible. There is no “one size fits all” model for consultation with Native Hawaiian organizations. This final section of the Native Hawaiian Consultation Handbook provides helpful tips on how to put them into practice.

Respect is Essential

- Become aware of and respect Native Hawaiian conventions and protocols. Understand that they may vary from island to island. Do not take photographs without obtaining permission first.
- Behavior you may perceive as normal may be insulting or offensive to others. Consider Native Hawaiian perspectives and values. When in doubt, ask respectfully.
- Members of Native Hawaiian organizations may have many other duties and obligations. In fact, unlike their tribal counterparts, Native Hawaiians may not hold paid positions in a Native Hawaiian organization. They may have full-time jobs that make it challenging to participate in meetings held during the day, for example. Look for ways to work cooperatively, because this is your undertaking, and consultation is your responsibility.
- Be sensitive to time and costs. A Native Hawaiian organization’s lack of human and financial resources may impede its representatives’ ability to respond quickly or to participate in meetings. Do not demand that everyone adhere to your schedule and deadlines. Instead, explain why your deadline exists, who set it, and why it is important. Make an effort to facilitate and support consultation with available agency resources. Above all, strive to be as flexible as possible.
- Do not voice your opinion on what is best for the Native Hawaiian organization; that is for its members to determine.
- Be mindful of the significance of history. The history of U.S. government relations with Native Hawaiian organizations may color current perceptions and attitudes and cause distrust or suspicion. Take the time to learn about the unique history of Hawaii and Native Hawaiians.

Communication is Key

- Communicate with Native Hawaiian organization representatives directly whenever possible—do not rely solely on letters. Follow up written correspondence by phone or in person. Create documentation of your communications, such as notes on the content of discussions, keep phone logs, etc.
- Provide project information and timelines for the project as early in consultation as possible. Clarify any constraints or additional requirements which may impact the Section 106 process.
- Do not expect quick answers. Native Hawaiian organization representatives may need time to consult with others in the organization. Make sure you understand their timelines for decision-making.
- Do not assume silence means concurrence; it could signal disagreement. Always verify views with the official Native Hawaiian organization representative.
- Always ask the representatives of Native Hawaiian organizations about their preferred way of doing business and any specific protocols for meetings. Be aware that their cultural norms may be different from yours.
- Be mindful of appropriate behaviors. Always show deference toward elders and allow them plenty of time to speak first. Do not interrupt or raise your voice. Learn by observation and by talking to others. Again, when in doubt, ask respectfully.

Consultation: Early and Often

- Make sure you identify and initiate consultation with Native Hawaiian organizations at the *start* of the planning process for your agency's undertaking.
- Suggest a process for consultation and discuss it with the Native Hawaiian organizations. Collaborate in a way that accommodates the protocols and schedules of Native Hawaiian organizations. The ACHP regulations at 36 CFR Section 800.2(c)(2)(ii)(E) provide for agreements with Native Hawaiian organizations that set out procedures for Section 106 consultation and can address concerns of Native Hawaiian organizations about confidentiality of information.
- Consider establishing an ongoing working group that can provide continuity for future undertakings by your agency.
- Focus on partnerships rather than on project-by-project coordination.
- Remember to document all correspondence, follow-up telephone calls, consultation meetings, and visits to project sites. Be sure to include the content of your communications in your documentation.
- Ask Native Hawaiian organizations representatives to keep you up-to-date on any changes to postal or e-mail addresses and contact information for new leadership.

Effective Meetings Are a Primary Component of Successful Consultation

- Consider requests from Native Hawaiian organizations to meet to discuss the project or address concerns. Some Native Hawaiian organizations might request individual meetings to discuss issues privately with the federal agency.
- Offer to go on-site with traditional authorities. Some people may be uncomfortable relying solely on maps, and site visits may stimulate consideration of alternatives.
- Do not create expectations or make commitments that you are unable or unwilling to fulfill. Before entering into consultation, be certain that what you are negotiating is supported by the Office of General Counsel or Solicitor of your agency, and anyone else who will need to review and approve your position.
- Do not set your own meeting agenda or logistics without consulting with Native Hawaiian organization representatives to learn what they expect the process and substance to be. Native Hawaiian organizations may have their own ways of conducting meetings, so be respectful of customs and protocols.
- Inform Native Hawaiian organization representatives in advance of the meeting's goal and what needs to be accomplished in the time you have, so that participants can stay focused. Like you, Native Hawaiian organizations representatives are there to work and accomplish results.
- Give plenty of notice beforehand so that Native Hawaiian organization representatives have adequate time to prepare. Provide participants with a list of all attendees, an agenda, and most importantly, complete project documentation.
- Speak to Native Hawaiian organization representatives by phone beforehand so that you know who will be attending the meeting. Allow Native Hawaiian organizations to send as many representatives as they wish, but explain any limitations that your agency may have with funding travel.
- Check if anyone has special needs. Some elders may need special accommodations.
- Offer the Native Hawaiian organization participants the opportunity to make an opening or welcoming statement.
- Make sure you invite Native Hawaiian organization representatives to sit at the table with you, and introduce all participants with their proper titles. Check with your Native Hawaiian organization contact beforehand so you know if certain officials or elders should be introduced and acknowledged first.
- Review your agency's mission and operations at the start of the meeting. Do not assume that everyone knows how your agency functions or is familiar with all of the programs it oversees.
- Take accurate notes during the meeting, or, *if the Native Hawaiian organization representatives agree in advance*, arrange for meetings to be recorded (it is still advisable to take notes to avoid problems should a recording be lost or damaged). It is important to document not only that you

have consulted, but the substance of the meeting and the views and concerns expressed by the Native Hawaiian organization, as well. Be sensitive to the issue of confidentiality, which may require that you switch the recorder off, or to omit certain sensitive information from your notes if the Native Hawaiian organization representatives so request. Documenting meeting content ensures that participants can later review and correct any inaccuracies, and also provides the agency with a solid consultation record.

- Be prepared on the issues and be open to Native Hawaiian organization perspectives.

Conclusion

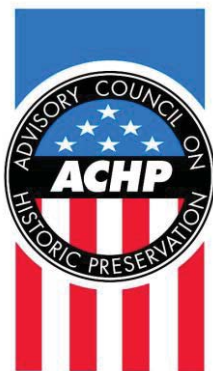
We hope this handbook has been helpful. If needed, you may obtain further assistance from the ACHP in understanding and interpreting the requirements of Section 106, including Native Hawaiian consultation. For general information, please visit the ACHP Web site at www.achp.gov.

Acknowledgements

We wish to thank Ray Soon, who has served as a mentor and adviser both during and since his tenure as a presidentially-appointed member of the ACHP. His vision for the Office of Native American Affairs continues to shape our work. We also wish to thank Fred Cachola and Shad Kane for their tireless and patient assistance to the staff in the development of this handbook and in many of the ACHP's Native American initiatives in their capacity as the Native Hawaiian representatives to the ACHP's Native American Advisory Group. Their wisdom and knowledge has greatly enriched our own understanding as well as our ability to assist others in the protection of Native Hawaiian historic places. *Mahalo nui loa.*

Finally, *mahalo* to all the Native Hawaiians who contributed comments and talked story with us to make this a better handbook.

Office of Native American Affairs
Advisory Council on Historic Preservation



Preserving America's Heritage

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25 JAN 2010

NGB-ARE

MEMORANDUM FOR The Environmental Program Manager (EPM) of all States, Puerto Rico, the US Virgin Islands, Guam and the District of Columbia

SUBJECT: Army National Guard Integrated Cultural Resource Management Plan (ICRMP) Policy Guidance for Revisions and Updates

1. **PURPOSE.** This memorandum establishes NGB-ARE guidance for the implementation and revision of ICRMPs.
2. **APPLICABILITY.** This policy guidance applies to all state ARNG Environmental Programs.
3. **REFERENCES:**
 - a. New Policy Guidance for Development of the Integrated Cultural Resources Management Plan, 11 Dec 2009
 - b. Department of Defense Instruction Number 4715.03, Environmental Conservation Program, 3 May 1996.
 - c. Department of Defense Instruction Number 4715.16, Cultural Resource Management, 18 Sep 2008.
 - d. Army Regulation 200-1, Environmental Enhancement and Protection, 13 Dec 2007.
 - e. Department of Defense Policy American Indian and Alaska Native Policy, 01 Oct 1998.
 - f. Department of Defense Instruction Number 4710.01, DoD Interactions with Federally Recognized Tribes, Sep 2006.
4. **GENERAL.**

a. **GOAL.** The goal of this guidance is to provide details for the development of Integrated Cultural Resource Management Plans (ICRMPs). Under the National Historic Preservation Act of 1966, as amended (NHPA), Federal agencies are required to develop programs to identify, evaluate and preserve historic properties in accordance with the agency's mission. Department of Defense Instruction (DoDI) 4715.16 is the Department of Defense's over reaching guidance which requires establishment of an

**SUBJECT: Army National Guard Integrated Cultural Resource Management Plan
(ICRMP) Policy Guidance for Revisions and Updates**

(1) A revision replaces the existing ICRMP. It can occur at any time based on one or both of the following:

(a) Changes to goals, objectives, management, legal, or regulatory changes that result in negative impacts to cultural resources (see 6.iv.3 for defining qualities of "negative impacts"); and/or,

(b) It is determined necessary in state ARNG consultation with the SHPO, NGB, or other stakeholders. It is the state ARNG's decision, however, as to whether an ICRMP Revision or Update is needed based on this consultation.

(2) A revision contains all required ICRMP sections and information and is subject to NEPA review, typically an Environmental Assessment.

(3) SHPO, Federally-recognized Native American and Alaskan Tribes and Native Hawaiians, other interested stakeholders should receive a copy of the draft ICRMP Revision for review and/or comment. Copies of this correspondence should be included in the ICRMP Revision and provided to NGB.

b. ICRMP Update

(1) An update concerns only selected portions of an existing ICRMP. There are not any changes to mission and/or management goals or objectives that result in negative impacts to cultural resources. Most typically, an update changes the status of projects/tasks to achieve previously identified objectives.

(2) Other common updates may include:

- Updates to survey data/studies
- New maps/imagery
- Agreement documents
- Listing of new proposed projects
- New National Register eligibility findings

(3) Needs only a Record of Consideration (REC) under NEPA and does not need public review IF the following occur:

- Management goals, mission, other defined operations and resources have not changed other than updated inventories; and/or,
- Projects are updated for new period to meet continuing management goals; and/or,
- Support data is updated such as new GIS maps.

d. Documented conclusions will include:

- If the ICRMP needs only an UPDATE, then outline the needed updates and list recurring and new projects.
- If the ICRMP needs REVISION due to changes in management, or goals and objectives, then outline changes in these areas and list recurring and new projects supporting these changes.

e. ICRMP Review Factors:

(1) If Review determines that ICRMP is not having intended effect, then revision is likely required.

(2) An ICRMP that is, or will no longer be, successful without changes will require a full ICRMP Revision.

(3) Negative Impacts to Cultural Resources

(a) Negative impacts to cultural resources are measurable changes on historic properties and their integrity and/or associated characteristics which identified them as eligible for the National Register that cannot be mitigated through available resources (such as NHPA Agreement Documents) or actions outlined in the original ICRMP. This can include individual or cumulative effects from projects, policies and procedures, or land management/use decisions.

(b) Consequences are interpreted to follow the Criteria of Adverse Effect (36 CFR § 800.5(a)(1)): "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register."

7. WHEN AN ICRMP REVISION IS PREFERRED.

The following are examples of when an ICRMP should be revised, not updated.

a. Preservation or Environmental Goals Changed:

(1) New/modified set of environmental goals:

(a) New Regional or National contexts or Areas of Interest developed.

NGB-ARE-C

SUBJECT: Army National Guard Integrated Cultural Resource Management Plan (ICRMP) Policy Guidance for Revisions and Updates

c. It is important that the state ARNG consider the scale of modifications in addition to changed goals/objectives in determining whether an ICRMP Revision or Update is warranted.

8. ICRMP REVISION REQUIREMENTS.

a. Based on the ICRMP Review (Section 6 above), changes will be made to revise the ICRMP. Revisions may use the most recent NGB ICRMP template, if the state ARNG so chooses.

b. Requires Environmental Assessment (EA) with FNSI including review w/public review, SHPO, Federally-recognized Native American and Alaskan Tribes and Native Hawaiians, other interested stakeholders, and staffed to NGB.

c. Second draft incorporates comments, receives 2nd public review, is staffed to NGB for final approval/legal sufficiency (include draft FNSI with EA), SHPO, Federally-recognized Native American and Alaskan Tribes and Native Hawaiians, other interested stakeholders (prefer concurrence and signatures).

d. Final version of ICRMP with concurrence, if possible, by SHPO, Federally-recognized Native American and Alaskan Tribes and Native Hawaiians, other interested stakeholders is staffed to NGB for final approval and signature of ICRMP and FNSI.

e. The five (5) year implementation period initiates after all signatories, including the Chief of NGB-ARE, have signed the ICRMP and FNSI.

9. NEPA REQUIREMENTS FOR ICRMP REVISIONS AND ICRMP UPDATES.

a. ICRMP Revisions – Five (5) year: Environmental Assessment (EA) and Finding of No Significant Impact (FNSI).

b. ICRMP Update – Five (5) year: Record of Consideration (REC), Copy of original signed FNSI.

c. Update – Annual: A REC is not required.

10. ICRMP VARIANCES.

a. Every five years, those state ARNGs having being granted an ICRMP variance will be required to reassess the need for ICRMPs as part of the ICRMP Review Process. The state ARNG requesting the variance must fill out the NGB variance request form and submit for review. The NGB will determine whether the state ARNG variance request is



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ARNG-ILE

25 MAY 2012

MEMORANDUM FOR ENVIRONMENTAL PROGRAM MANAGERS

SUBJECT: National Historic Preservation Act (NHPA) Section 106 Requirements for National Environmental Policy Act (NEPA) Record of Environmental Consideration (REC) Forms

1. PURPOSE. This memorandum updates the Army National Guard Environmental Division (ARNG-ILE) guidance to the state Army National Guard (ARNG) Environmental Offices on their compliance requirements for NHPA associated with the completion of NEPA Records of Consideration (RECs).

2. APPLICABILITY. This policy guidance applies to all state ARNG installations using a Categorical Exclusion (CX) as a means to comply with the NEPA. This guidance will assist in the integration of the NHPA and the NEPA processes for successful completion of the NEPA checklist and REC documentation. This guidance is not applicable to projects requiring an Environmental Assessment (EA) or Environmental Impact Statement (EIS). This memorandum supersedes previous guidance issued 18 March 2009.

3. GENERAL. The NHPA is a separate law requiring compliance regardless of the level of NEPA. The NHPA ensures effects to cultural resources are properly considered. The NEPA is an umbrella law that ensures an agency's effect on the environment as a whole is taken into consideration prior to project implementation. Compliance with the NHPA and the NEPA are not mutually inclusive or exclusive.

4. Each state (installation) is required to designate a Cultural Resources Manager (CRM) per AR 200-1, Section 6-4a(3). If a state controls historic properties as defined by 36 CFR 800, it is highly recommended the state ensures its CRM has the appropriate experience and/or education to manage those properties in accordance with the NHPA.

5. The NHPA **applies** for actions within a NEPA REC when the following **two** criteria are met:

a. Criterion 1: When the definition of an NHPA "undertaking" is met (36 CFR 800.16(y)).

"Undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval."

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Translation – This applies when the ARNG Directorate is funding or approving an action on either state-owned/state-operated (SO/SO), federally-owned property OR the state is performing an action on Federal property regardless of funding source. In addition, actions requiring Federal permits trigger NHPA compliance, including United States Army Corps of Engineers (USACE) wetlands permits.

b. Criterion 2: When an activity “*has the potential to cause effects to historic properties*” (36 CFR 800.3(a)(1)).

(1) Examples of actions (undertakings) requiring NHPA compliance:

- Ground disturbance of any kind (even if previously disturbed)
- New construction
- Any renovation/repair work to a building that is older than 50 years of age (i.e. window replacements, roof replacement, guttering, tuck-pointing, etc)
- Demolition of a building/structure
- Altering the viewshed of a historic, or eligible/listed National Register (NRHP) property

(2) If there are questions regarding what actions have the potential to cause effects to historic properties, contact an ARNG-ILE-T Program Manager.

6. When the NHPA **does not** apply:

- a. Renewal of leases (Does not meet Criterion 2 above).
- b. When the action is not within or immediately adjacent to and/or visible from other NRHP eligible/listed properties.
- c. Work to most buildings constructed less than 50 years ago (does not meet Criterion 2 above). There are exceptions to this, however: if a building meets the NHPAs “Exceptional” Criterion G.
- d. Work on buildings constructed over 50 years ago but do not meet Criterion 1 above (example – State ARNG owned/operated buildings renovated with state ARNG funds only). Note: State Preservation laws may apply.

7. The following outlines specific guidance for each question regarding Cultural Resources on the NEPA REC checklist (questions 17-26).

a. ***Question 17 – Does the project involve an undertaking to a building or structure that is 50 years of age or older?***

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Use definition of undertaking above in para 5.a to answer this question accurately.

b. *Question 18 – Has the building or structure been surveyed for the National Register of Historic Places (NRHP)?*

Evaluate for NRHP status all buildings or structures 50 years of age or older. Prior evaluations, regardless of the date of evaluation, are sufficient in most cases.

c. *Question 19 – Is the building or structure eligible for or listed on the National Register of Historic Places?*

If no NRHP evaluation has occurred (Question 18), the building must be considered NRHP-eligible until an official determination occurs. This determination is made in consultation with the State Historical Program Officer (SHPO).

The state ARNG is responsible for documenting that NRHP eligibility was determined and the SHPO concurred with the findings, but these consultation letters do not need to be included in the REC paperwork. This documentation must be made available upon request of the ARNG-ILE Program Manager and for Environmental Performance Assessment System (EPAS) Inspections.

d. *Question 20 – Does the action involve ground disturbing activities?*

Use definition of undertaking above in para 5.a to answer this question accurately. Note that previous ground disturbance is irrelevant when answering this question.

e. *Question 21 – Has an archaeological inventory or research been completed to determine if there are any archaeological resources present?*

The area affected by ground disturbance must be evaluated for NRHP-eligible archaeological sites. The surveys can be completed several years before the proposed action under review within the REC; however, keep in mind that NRHP determinations can change as a result of new information or changes in archaeological techniques, methodologies, and standards. **The surveys should include determinations of eligibility.**

The state ARNG is responsible for documenting that NRHP eligibility was determined and the SHPO concurred with the findings, but these consultation letters do not need to be included in the REC paperwork. This documentation must be made available upon request of the ARNG-ILE Program Manager and for EPAS Inspections.

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f. Question 22 – In reviewing the undertaking, under the National Historic Preservation Act (NHPA) (for both above and below ground resources), what determination was made by the State ARNG?

Use this question to capture the determination of effect made for this undertaking, in consultation with the SHPO. The SHPO concurrence letters do not need to be included in the REC paperwork.

(1) If the action is **not an undertaking requiring consultation under Section 106**, select “No 106 undertaking” and skip the remaining cultural resources questions (# 23-26); Section 106 does not apply to these types of actions, and no correspondence with the SHPO or the Tribes is necessary. In order for this selection to apply, the action must be of the type that has no potential to affect historic properties (i.e. no ground disturbance, no alteration of structures or landscape). New leases or lease renewals are the most common types of actions that will fall into this category.

(2) If there are **no historic properties** present within the Area of Potential Effect (APE), select “No properties affected” on the REC Checklist. Record the date that the SHPO letter concurring with this determination was sent. The SHPO concurrence letter does not need to be included in the REC paperwork.

(3) If there are historic properties present within the APE, and the State ARNG has determined that there will be **no adverse effect** to these properties as a result of this undertaking, select “No adverse effect” on the REC Checklist. Record the date that the SHPO letter concurring with this determination was sent. The SHPO concurrence letter does not need to be included in the REC paperwork.

(4) If the state ARNG determines that the undertaking will have an **adverse effect** on a historic property (above or below ground), select “Adverse effect” on the REC Checklist. Additional consultation to mitigate the adverse effects will be required in this case (see Question 23).

g. Question 23 – Has the State ARNG addressed the adverse effect?

If there is an adverse effect, a signed NHPA agreement document (Memorandum of Agreement [MOA] or Programmatic Agreement [PA]) will be required before the REC will be approved. Notify ARNG-ILE CRMs as soon as possible for assistance in developing the agreement document. Develop agreement documents in consultation with stakeholders and following applicable laws and ARNG-ILE guidance. If the agreement is to be reviewed and signed by ARNG-ILE, the State ARNG, the SHPO, and the Advisory Council on Historic Preservation (ACHP) (if they so choose) must be included in the development. Record the date of execution and a brief explanation of the agreed-upon mitigation measures in Question 23a.

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h. *Question 24 – Per DoDI 4710.02, did the State ARNG determine that tribal consultation was necessary for this project?*

Tribal consultation is required for actions that meet the criteria for an undertaking as defined above. Consultation is only required with federally recognized tribes with an interest in the project area. Consultation with tribes for the creation of Integrated Cultural Management Resource Plans (ICRMPs) and/or Integrated Natural Resource Management Plans (INRMPs) or previous EAs is not considered sufficient. **All correspondence with tribes should be captured within a Memorandum for Record (MFR);** however, MFRs do not need to be included in the REC paperwork.

(1) If the state ARNG has a signed agreement document [Memorandum of Understanding (MOU)] in place that clarifies the types of undertakings the tribes are interested in consulting, the state ARNG will follow those agreed-upon procedures. Clearly state this information in Question 24a.

(2) If the state ARNG has regular consultations with tribes and the action described within the REC is discussed with tribes during this time OR the state ARNG knows, based on these regular consultations, that the tribes are not interested in the project area or the particular type of undertaking, this consultation will suffice for the REC. Clearly state this information in Question 24a and ensure it is documented.

(3) If the state ARNG cannot document recent (within 2 years) consultation with tribes discussing the project area, then the state must consult for actions associated with RECs as stipulated within the NEPA Handbook with tribes in a minimum of one certified letter.

(4) If consultation was completed, develop an MFR capturing the process, and record the date of the MFR on the REC Checklist. Copies of the tribal letters and the MFR do not need to be included in the REC paperwork; however, they should be available upon request of the ARNG-ILE Program Manager and for EPAS Inspections.

i. *Question 25 – Did the Tribes express an interest or respond with concerns about this project?*

If YES, additional consultation with the tribes is required. Question 26 addresses this issue.

If NO, develop an MFR documenting that the Tribes have no interest or concerns, and record the date of the MFR on the REC Checklist. Copies of the tribal letters and the MFR do not need to be included in the REC paperwork; however, they should be available upon request of the ARNG-ILE Program Manager and for EPAS Inspections.

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j. ***Question 26 – Has the State ARNG addressed the Tribal concerns?***

Additional consultation is required to address concerns expressed by the tribes, which may result in the development of an MOU or MOA. Notify ARNG-ILE CRMs as soon as possible if the state ARNG is pursuing this course of action with the tribe(s). ARNG-ILE CRMs as they should be a part of development of the agreement document. These concerns must be adequately addressed before the REC can be signed.

7. The point of contact is Rebecca Klein, Cultural Resources Program Manager, at (703) 607-1176 and rebecca.a.klein@us.army.mil.

A handwritten signature in black ink that reads "Beth A. Erickson". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

BETH A. ERICKSON
Acting Chief, Environmental
Programs Division

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U.S. Army Historic Preservation Program

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Privatization of Army Lodging

The United States Army is currently undergoing a significant privatization effort of lodging facilities throughout the continental United States. This privatization effort has already occurred at 21 installations in two previous phases. The third phase consists of 21 additional installations in 13 states and is the subject of a new prototype Programmatic Agreement (PA).



For the previous phases, a time consuming effort was undertaken to create individual PAs for each installation. The prototype PA for the third phase provides a tool that can assist in the cultural resource management of an Army installation's historic properties associated with the privatization of Army lodging. Most importantly, the Prototype PA provides a streamlined approach to the process of developing, negotiating and implementing PAs for the installations that have historic properties impacted by this privatization effort. The prototype PA will create efficiencies by providing standardized language that will be used to create subsequent PA's for the remaining 21 installations that will take part in the privatization of lodging.

A Prototype PA provides for consistency and predictability in cost, time, and outcomes, as well as the flexibility to address specific situations and conditions on each installation. As a result of agreement reached on the Prototype PA, following consultation on its development, subsequent consultation to develop installation-specific agreements for lodging privatization



should be less rigorous and more efficient. The installation can, after appropriate consultation with stakeholders, include language in the subsequent agreements that address similar actions in multiple geographical areas.

Archeological investigations may be necessary if there is significant ground disturbance in previously undisturbed areas and would be considered during the consultation for each installation's PA for the Privatization of Army Lodging (PAL) program. Cultural landscapes and/or view sheds that are impacted by any new construction will have to be taken into consideration during the consultation for each installation's PA for the lodging privatization program.

The Army conducted multiple meetings with an internal Army working group. This group was comprised of Cultural Resource Managers from Army installations, staff members of the Army Environmental Center, and other parties within the Army historic preservation community. In addition, there have been meetings with State Historic Preservation Offices, Tribal Historic Preservation Officers, the National Conference of State Historic Preservation Officers, the National Park Service, and the National Trust for Historic Preservation, federally recognized Indian tribes and ACHP staff. The Army prototype was approved on April 5, 2012.

- [Prototype PA](#)
- [Prototype PA Guidance](#)

Army Interiors Prototype Programmatic Agreement

The Department of the Army has, in concert with the ACHP, developed a Prototype Programmatic Agreement (PA) for the interiors of contributing buildings and individually eligible buildings pursuant to 36 CFR 800.14(e). The Army has more than 20,000 buildings considered eligible for the National Register in its



inventory. There are many examples of interiors within the Army inventory that have been altered to the extent that they no longer contribute to the significance of the building or structure or were never considered contributing to the building's or a historic district's significance. Over the past year, a number of Army initiatives and Executive Orders have been implemented that require installations to improve the energy efficiency and environmental sustainability of their facilities. These initiatives have the potential to impact interiors of eligible buildings; therefore a programmatic approach was needed to assist in the protection of historic interiors while also assisting in the implementation of sustainability guidance.

The Army determined that a Prototype PA would provide Cultural Resource Managers at Army installations an additional tool to use in meeting their responsibilities under Section 106 for these federal facilities, and to streamline the consideration of these interiors. The Army proposed an approach that would relieve an installation from having to consider effects of undertakings on building interiors that have been deemed to be non-contributing or retain no character defining features. In order to

facilitate the adequate assessment of the integrity of an interior or whether the interior is contributing to the significance of the building, an interiors survey format that is appropriate to this task has been developed as part of this Prototype PA. This survey streamlines the process of Section 106 review for undertakings that may affect non-contributing interiors. If the procedures in the Prototype PA are followed by the installation, no case-by-case review by the State Historic Preservation Officer (SHPO) would be required for those aspects of undertakings that may affect interiors that have been deemed to be non-contributing.

Outreach to Consulting Parties

The Army conducted multiple meetings with an internal Army working group that consists of multiple participants from throughout the United States. This group was made up of Cultural Resource Managers from Army installations, staff members of the Army Environmental Center, Army National Guard Cultural Resource practitioners, and other parties within the Army historic preservation community. In addition, there have been numerous meetings with the National Park Service, National Conference of State Historic Preservation Officers, National Trust for Historic Preservation, and ACHP staff.

Current Status

The ACHP issued the Prototype PA on July 19, 2011. The Army is now authorized to convey this Prototype PA to its installations. These agreements can be negotiated between an installation and a SHPO without the involvement or approval of the ACHP. Several installations have already expressed interest in doing so.



Next Steps

Given the designation of two Prototype PAs for the Department of Energy's weatherization programs and Army Interiors, as well as current plans underway to develop additional Prototype PAs for the Federal Emergency Management Agency and the Natural Resources Conservation Service, it is clear that agencies find Prototype PAs to be useful tools for addressing certain preservation programs. In recognition of this expanding interest, ACHP staff has begun efforts to develop guidance on the process of developing Prototype PAs in order to address this expanding interest and guide agencies on those steps necessary to develop and implement such an agreement pursuant to the Section 106 regulations. Staff will share its vision for this guidance and seek committee input on its development.

- [Army Interiors Prototype Programmatic Agreement July 2011 \(PDF\)](#)
- [Army Prototype Programmatic Agreement Guidance Letter July 2011 \(PDF\)](#)
- [Army Interiors Prototype PA Form \(PDF\)](#)
- [Appendix B Stakeholders \(PDF\)](#)

Army Cultural Resource Management Program: Policy and Regulations

The Army is dedicated to pursuing innovative policies, programs, and initiatives to improve cultural resources management. Responsibility for cultural resources management at the Army headquarters level resides in two offices: the Office of the Assistant Chief of Staff for Installation Management's Installation Support Directorate – Environment (ISE), and the US Army Environmental Command (USAEC). ISE is responsible for promulgating cultural resources policy and guidance, while USAEC is the center for technical expertise. Most Army installations also have qualified cultural resources personnel on staff.



The Department of the Army's official policy for management, care, and preservation of cultural resources can be found in [Environmental Protection and Enhancement \(AR 200-1\)](#). AR 200-1 establishes broad preservation and operational policies for the Army by addressing the requirements of all major cultural resources laws, regulations, Executive Orders, and Presidential memoranda. In reference to [36 CFR Part 800](#), AR 200-1 establishes internal Army policy for compliance with ACHP's regulations and is not designed to replace the Section 106 compliance procedures set forth in 36 CFR Part 800.

Recently, the Army has emphasized the need for integrated cultural resources management—this is a "cultural landscape" approach to planning and management, whereby the military installation is viewed as an integrated landscape of natural and cultural resources and processes including military operations. Rather than a strictly compliance-driven approach to cultural resource management, the Army is moving towards a comprehensive integrated planning concept.

For more information about the Army's technical documents and resources, refer to USAEC's [Cultural Resources Management Program](#) Web site.

Interagency Agreement Between the Army and ACHP

In March 1996, ACHP entered into an interagency agreement (IAG) with USAEC to provide technical expertise and support in implementing the Army's cultural resources management program. This partnership assists the Army in developing efficient and effective means to manage cultural resources on its lands. Under this arrangement, ACHP assigns one or more Liaisons to USAEC to implement the agreement and to serve as subject matter experts on historic preservation issues.



The ACHP and USAEC work cooperatively to enhance the state of cultural resources management on Army lands, particularly through the development of programmatic

methods of compliance with the ACHP's regulations at 36 CFR 800. The more notable accomplishments of the partnership include the Army Alternate Procedures and the Program Comments for four categories of World War II and Cold War era buildings.

Army Alternate Procedures to 36 CFR 800

[Download the amended Army Alternate Procedures \(in pdf format; 12 pp.\)](#)

Background

On July 13, 2001, the Advisory Council on Historic Preservation approved the Army's alternate procedures, established under 36 CFR 800.14(b), the culmination of years of cooperative effort between the ACHP and Army. The Army Alternate Procedures (AAP) allow installations to work with consulting parties to develop a streamlined plan for its Section 106 compliance responsibilities.

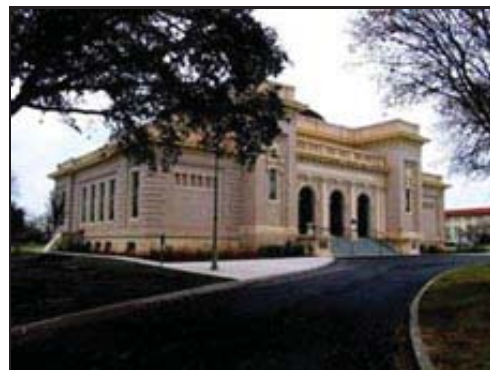
The Alternate Procedure Process

The Army Alternate Procedures are designed to accomplish the following goals:

- Provide for more efficient, consistent, and comprehensive Army compliance with the goals and mandates of Section 106;
- Encourage more thoughtful consideration and planning for historic properties;
- Support the Army's ability to accomplish the critical mission of training soldiers for defense of the Nation; and
- Establish a proactive planning and management based approach to historic preservation and compliance to stand in place of the formal case-by-case review process prescribed in [36 CFR Part 800\(B\)](#).

Installations may choose either to continue to follow ACHP's regulations in the implementation of installation undertakings or to follow the Army Alternate Procedures. Installations that follow the Army Alternate Procedures will prepare a Historic Properties Component, based on the installation's Integrated Cultural Resource Management Plan (ICRMP) in consultation with [State Historic Preservation Officers](#) (SHPOs), [Tribal Historic Preservation Officers](#) (THPOs), Indian tribes, and other stakeholders.

The Historic Properties Component (HPC) addresses standard operating procedures for the identification, evaluation, assessment of effects, treatment, and management of historic properties, including those of traditional religious and cultural importance to federally recognized Indian tribes or Native Hawaiian organizations. The HPC also includes standard operating procedures for annual review and monitoring of installation undertakings with consulting parties to include the SHPO/THPO, federally recognized Indian tribes, and Native Hawaiian organizations.



ACHP certifies installations that have completed the HPC and have met the certification criteria. Upon certification, the installation is free to implement its actions in accordance with the agreed-upon standard operating procedures for five years without further SHPO, THPO or ACHP project-by-project review. The Army Alternate Procedures provide a process for amendments and recertification of the Historic Properties Component. Furthermore, the procedures include provisions for ACHP review of Army programs and installation compliance, and for ACHP assistance in improving Army program efficiency.

Army Alternate Procedures Contacts

Questions concerning the Army's Alternate Procedures or their implementation may be directed to the ACHP (see contact information [below](#)). You may also consult [USAEC's AAP web page](#).

Program Comments on World War II and Cold War era Properties

Another programmatic approach on which the ACHP and Army worked very closely together was the development of program comments. Program comments fulfill the Section 106 compliance responsibilities for a category of undertakings;



more information can be [found here](#). The Army has sought Program Comments to address the massive compliance challenge presented by the buildings and structures constructed during World War II and the Cold War. Many of these buildings are currently subject to NHPA, and tens of thousands more will reach the 50-year mark within the next twenty years. Without a programmatic compliance action like the Program Comments, this would put an enormous strain on installations as they seek to meet their regulatory requirements.

Capehart and Wherry era (1949-62) Army Family Housing, Associated Structures, and Landscape Features

The first program comment developed was for Army housing built under the Capehart and Wherry Acts to meet the unprecedented need for family housing during the early Cold War. Issued in 2002, the Program Comment covered Section 106 compliance requirements for more than 19,000 Army family housing buildings built between 1949 and 1962. Installations may renovate, mothball, demolish, or transfer the buildings from Federal ownership without further Section 106 review for effects to those properties. The Program Comment does not cover other historic buildings or archeological sites affected by undertakings to Capehart and Wherry era buildings.

Treatment measures required by the Program Comment include a historic context, Neighborhood Design Guidelines, and video documentation. The context identified

potential properties of particular importance, which were then used as the focus of the video documentation.

The historic context and Neighborhood Design Guidelines were completed in June 2003. Distribution of the final versions of both the design guidelines and historic context is limited to U.S. government agencies. The video is available at aec.army.mil/usaec/cultural/housing.html in low and high bandwidth versions.

Program Comments for Cold War Unaccompanied Personnel Housing, and World War II and Cold War era Ammunition Storage and Production Facilities and Army Ammunition Plants

The ACHP issued three more program comments in 2006; two, covering unaccompanied personnel housing (barracks) and ammunition storage facilities, were issued to all of the Department of Defense, while one, for ammunition production facilities and Army Ammunition Plants, was issued to the Army alone. These program comments fulfilled Section 106 compliance requirements for an additional 35,000 Army buildings.



The Program Comments require the Army to conduct several treatment measures, including:

- a publicly available version of the historic context [Unaccompanied Personnel Housing](#) during the Cold War (1946-89)
- historic contexts on Cold War era Ammunition Storage and Production
- a display and popular publication on the ammunition process
- documentation of representative property types at 11 installations

Covering both production and storage facilities for ammunition gave the Army an opportunity to examine the interaction of the property types, and similarities between their construction and operation. As a result, the Army developed a popular publication on the World War II ammunition production process, paying particular attention to the social history of the plants and manufacturing.

Further information on the three Program Comments can be found on the [USAEC website here](#).

Federal Preservation Officer

[View FPO Contact Information](#)

Agency and Related Links

Department of the Army: www.army.mil

U.S. Army Environmental Center: aec.army.mil

Cultural Resources Management Program, U.S. Army Environmental Center:
aec.army.mil/usaec/cultural/index.html

ACHP Contact for Policy and Program Issues

Office of Federal Agency Programs
Telephone: 202-606-8505

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COUNCIL ON ENVIRONMENTAL QUALITY
EXECUTIVE OFFICE OF THE PRESIDENT
AND
ADVISORY COUNCIL ON HISTORIC PRESERVATION

NEPA and NHPA

*A Handbook for Integrating
NEPA and Section 106*



MARCH 2013

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MARCH 2013

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I. INTRODUCTION

The environmental review process initiated with the passage of the 1966 National Historic Preservation Act (NHPA) (P.L. 89-665; 80 Stat. 915; 16 U.S.C. 470) by Congress ushered in a new approach to Federal project planning. The passage of the National Environmental Policy Act of 1969 (NEPA) (P.L. 91-190; 83 Stat. 852; 42 U.S.C. 4321) in December 1969 and its subsequent signing into law on January 1, 1970, expanded environmental reviews and formally established environmental protection as a Federal policy. NEPA and NHPA require Federal officials to “stop, look, and listen” before making decisions that impact historic properties and the human environment.

NEPA and NHPA each created agencies to implement major environmental programs that shape Federal project planning. The Advisory Council on Historic Preservation (ACHP) and the Council on Environmental Quality (CEQ) administer regulations viewed as the cornerstones of the Federal environmental review procedures. The *CEQ Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*, (40 C.F.R. Parts 1500-1508) (CEQ regulations) encourage integration of the NEPA process (NEPA review) with other planning and environmental reviews, such as Section 106 of NHPA (Section 106). The regulations that implement Section 106, *Protection of Historic Properties* (36 C.F.R. Part 800), encourage agencies to plan Section 106 consultations coordinated with other requirements of other statutes, as applicable, such as NEPA. The concepts of “coordination” and “integration” are found in both the CEQ regulations and Section 106 regulations, because they provide efficiencies, improve public understanding, and lead to more informed decisions.

This handbook provides advice on implementing provisions added to the Section 106 regulations in 1999 that address both “coordination” of the Section 106 and NEPA reviews and the “substitution” of the NEPA reviews for the Section 106 process. Coordination, addressed in 36 C.F.R. § 800.8(a), *“Coordination With the National Environmental Policy Act,”* encourages agencies to coordinate compliance with Section 106 with any steps taken to meet NEPA review requirements. Substitution,

WHAT IS A “HISTORIC PROPERTY?”

“Historic property” means any prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places maintained by the Secretary of the Interior (National Park Service). This term includes artifacts, records, and material remains that are related to and located within such properties. Properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization may be determined eligible for inclusion in the National Register.

[36 C.F.R. § 800.16(l)(1)]

For more information on the National Register of Historic Places and its eligibility requirements, see: <http://www.nps.gov/history/nr>

WHAT IS A “CULTURAL RESOURCE?”

Effects considered under NEPA include cultural and historic. [40 C.F.R. § 1508.8]

The term “cultural resources” covers a wider range of resources than “historic properties,” such as sacred sites, archaeological sites not eligible for the National Register of Historic Places, and archaeological collections.

See the DEFINITIONS AND TRANSLATIONS in [Attachment A](#).

addressed in 36 C.F.R. § 800.8(c), “*Use of the NEPA process for section 106 purposes*,” authorizes agencies to use the procedures and documentation required for the preparation of an Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) or an Environmental Impact Statement (EIS) and Record of Decision (ROD) to comply with Section 106 in lieu of the procedures in 36 C.F.R. § 800.3 through 36 C.F.R. § 800.6 of the Section 106 regulations.

This handbook also provides advice on implementing CEQ regulations that require agencies to “integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays in the process, and to head off potential conflicts.”¹ A 2003 report from the NEPA Task Force, *Modernizing NEPA Implementation*, recommended that CEQ develop a handbook to integrate the NEPA environmental review with Section 106 and other environmental review laws.² CEQ has issued a suite of guidances and memoranda to agencies on topics such as improving the efficiency of the NEPA process, establishing categorical exclusions, and mitigation and monitoring to reaffirm the NEPA principles of early integration of statutes and interagency cooperation.

This handbook is a joint effort between CEQ and the ACHP and has benefitted from broad agency review. It is intended to help practitioners take advantage of opportunities to coordinate NEPA and Section 106 compliance procedures to improve environmental reviews. The handbook will also help Federal agencies, project sponsors, and applicants identify early in project planning when they might benefit from the NEPA-Section 106 substitution process. A checklist of information needed to complete a legally sufficient substitution process is included at the end of the handbook to help agencies make an informed decision about which approach is most practical in a specific situation.

The ACHP and CEQ understand that agencies will apply concepts in this handbook consistent with their own mission, policies, and regulations, as well as the CEQ and Section 106 regulations to meet the increasingly complex challenges of project planning in the 21st century.

Accordingly, NEPA practitioners, preservationists, project sponsors, applicants, and the general public are encouraged to become familiar with and apply the key concepts for integrating NEPA and Section 106 compliance procedures:

- ▶ Begin integration of NEPA and Section 106 processes early—the earlier it begins, the better it works.
- ▶ Educate stakeholders on the benefits of integrating, through coordination or substitution, the NEPA and Section 106 processes.
- ▶ Develop comprehensive planning schedules and tracking mechanisms for the NEPA and Section 106 processes to keep them synchronized.
- ▶ Develop comprehensive communication plans that meet agency outreach and consultation requirements to maximize opportunities for public and consulting party involvement and minimize duplication of effort by agency staff. Plans should specify whether the agency will use coordination or substitution.
- ▶ Use NEPA documents to facilitate Section 106 consultation, and use Section 106 to inform the development and selection of alternatives in NEPA documents.
- ▶ Develop an integrated strategy to accomplish specialized studies to provide information and analysis needed under NEPA and Section 106.
- ▶ Complete Section 106 and the appropriate NEPA review (Categorical Exclusion, EA, or EIS) before issuing a final agency decision.

THE ADVISORY COUNCIL ON HISTORIC PRESERVATION (ACHP)

The ACHP provides guidance and advice and generally oversees the operation of the Section 106 process. The ACHP also consults with and comments to agency officials on individual undertakings and programs that affect historic properties.

THE PRESIDENT'S COUNCIL ON ENVIRONMENTAL QUALITY (CEQ)

CEQ coordinates Federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives.

II. BACKGROUND

Federal agencies have independent statutory obligations under NEPA and NHPA. Section 106 and the NEPA reviews help ensure that our natural, cultural, and historic environment is given consideration in Federal project planning. Federal courts have characterized both laws as requiring the Federal Government to “stop, look, and listen” before making decisions that might affect historic properties as one component of the human environment. The ACHP and CEQ present this handbook to address a long-standing need to improve the abilities of Federal agencies, applicants, project sponsors, and consultants to conduct these environmental reviews in the most efficient and effective way possible. It provides advice on implementing a 1999 provision in the Section 106 regulations, “Coordination with the National Environmental Policy Act,” 36 C.F.R. § 800.8. It also provides advice on implementing CEQ regulations, requiring agencies to “integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts.”³

This handbook uses the term “integrate” to encompass the terms used in both Section 106 and the CEQ regulations. “Integrate” as used in 40 C.F.R. §§ 1500.2(c) and 1502.25 encompasses “coordinate” as used in 36 C.F.R. § 800.8(a), and “substitution” of a NEPA process for Section 106 as used in 36 C.F.R. § 800.8(c). This handbook is intended to assist Federal planners, cultural resource managers, and other responsible parties in improving the integration of the NEPA analysis and documentation process and Section 106 compliance. The benefits of integrating compliance have long been recognized for maximizing staff resources, facilitating coordinated public participation in decision making, and leading to more informed decisions. The CEQ recently issued guidance on the topic of making NEPA reviews more efficient and timely,⁴ and this handbook furthers many of the principles presented therein.

This handbook will illustrate that integrating the two procedures:

Federal agencies are encouraged to coordinate compliance with Section 106 with any steps taken to meet the requirements of NEPA. Agencies should consider their Section 106 responsibilities as early as possible in the NEPA process, and plan their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner.
36 C.F.R. § 800.8(a)(1)

Federal agencies are encouraged to integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts.
40 C.F.R. § 1501.2

- ▶ Supports broad discussion of effects to the human environment and integrates the consideration of historic properties with other environmental factors.
- ▶ Facilitates the development of a comprehensive environmental review schedule that helps agencies reduce litigation risk by ensuring that requirements under both statutes and their implementing regulations are met in a timely manner.
- ▶ Provides agencies with opportunities to save time and expense by gathering information and developing public engagement strategies and documents that meet the statutory requirements of NEPA and NHPA with less duplication of agency effort.
- ▶ Enhances public engagement by providing State Historic Preservation Officer (SHPO); Tribal Historic Preservation Officer (THPO); applicants; tribal, state, and local governments; and other interested parties with opportunities to engage under both statutes at the same time.
- ▶ Helps ease potential duplication and time consuming processes for potential applicants.
- ▶ Promotes transparency and accountability in Federal decision making, and more informed, better decisions.

As agencies pursue project planning for more complex and expansive activities that have the potential to affect a myriad of resources, collaboration of NEPA and Section 106 practitioners and involvement of appropriate stakeholders early in project planning can inform the development and analysis of alternatives and the assessment and resolution of effects that meet the purpose and intent of Section 106 and the NEPA reviews. When the NEPA review and Section 106 are integrated, whether through coordination or substitution, an agency assesses ways to avoid, minimize, or mitigate adverse effects while identifying alternatives and preparing NEPA documentation. It is important for agencies to consider ways to avoid affecting historic properties before assessing potential mitigation measures to resolve adverse effects. If the proposed undertaking would have an adverse effect on a historic property and that effect cannot be avoided, then the agency can focus its consultation on the development of specific mitigation measures for that historic property.

WHAT IS CONSULTATION IN SECTION 106?

Consultation means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process.

For more information, see: <http://www.achp.gov> and http://www.nps.gov/hps/fapa_110.htm

STATE HISTORIC PRESERVATION OFFICER (SHPO) AND TRIBAL HISTORIC PRESERVATION OFFICER (THPO)

Pursuant to the NHPA, the SHPO and the THPO advise and assist, as appropriate, Federal agencies in carrying out their historic preservation responsibilities.

16 U.S.C. 470a(b)(3)(E) and (d)(2).

WHAT IS A SIGNIFICANT IMPACT IN NEPA?

Under NEPA, significance is determined based on context and intensity. Impacts are analyzed in several contexts such as society as a whole, the affected region, the affected interests, and the locality. Intensity refers to the severity of effect, which includes factors such as the magnitude, geographic extent, duration, and frequency of the effect.

[40 C.F.R. § 1508.27]

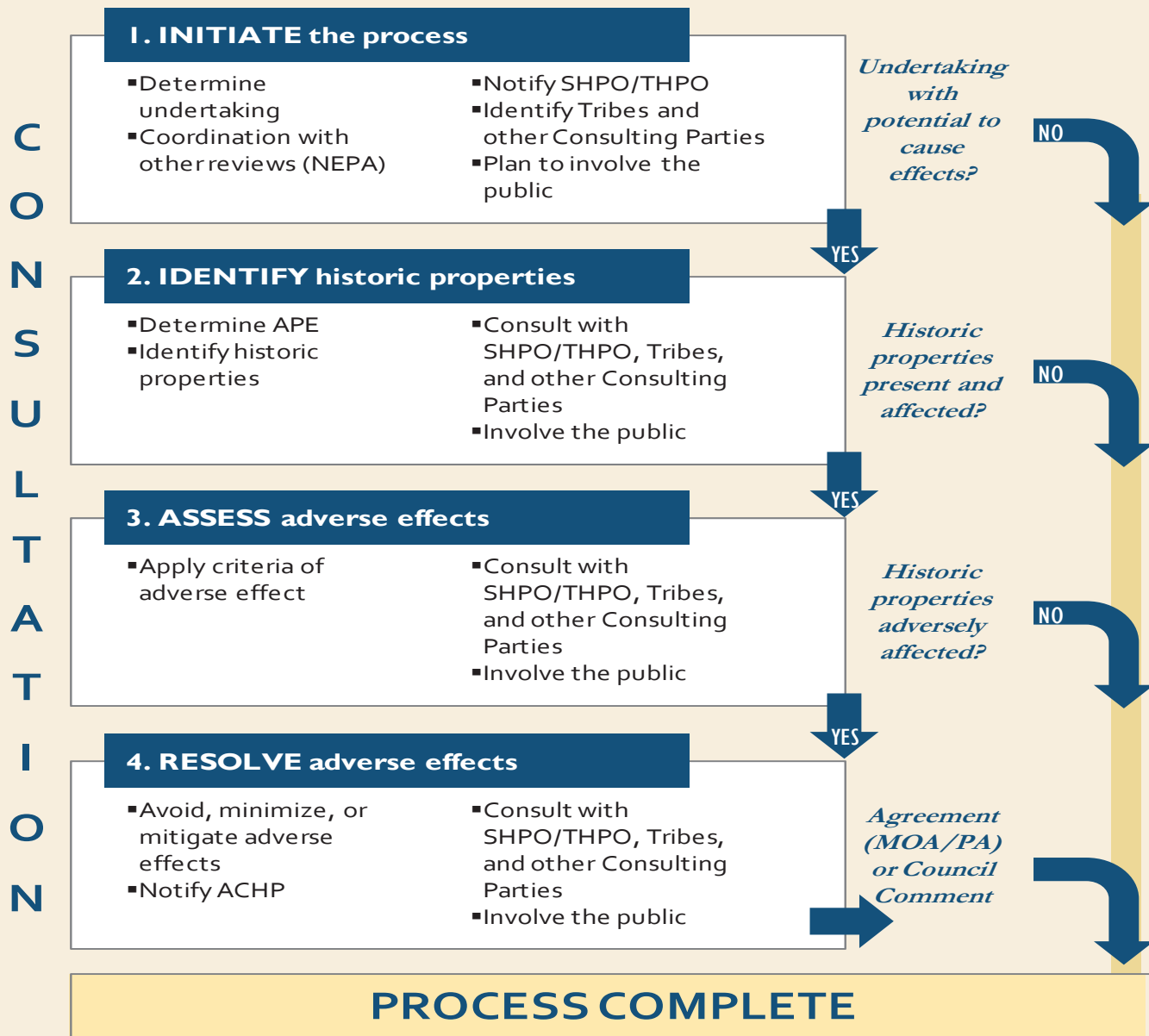
WHAT IS AN ADVERSE EFFECT IN 106?

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the property's integrity. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

[36 C.F.R. § 800.5(a)(1)]

See the DEFINITIONS AND TRANSLATIONS in [Attachment A](#).

THE SECTION 106 PROCESS



SECTION 106 OF THE NHPA

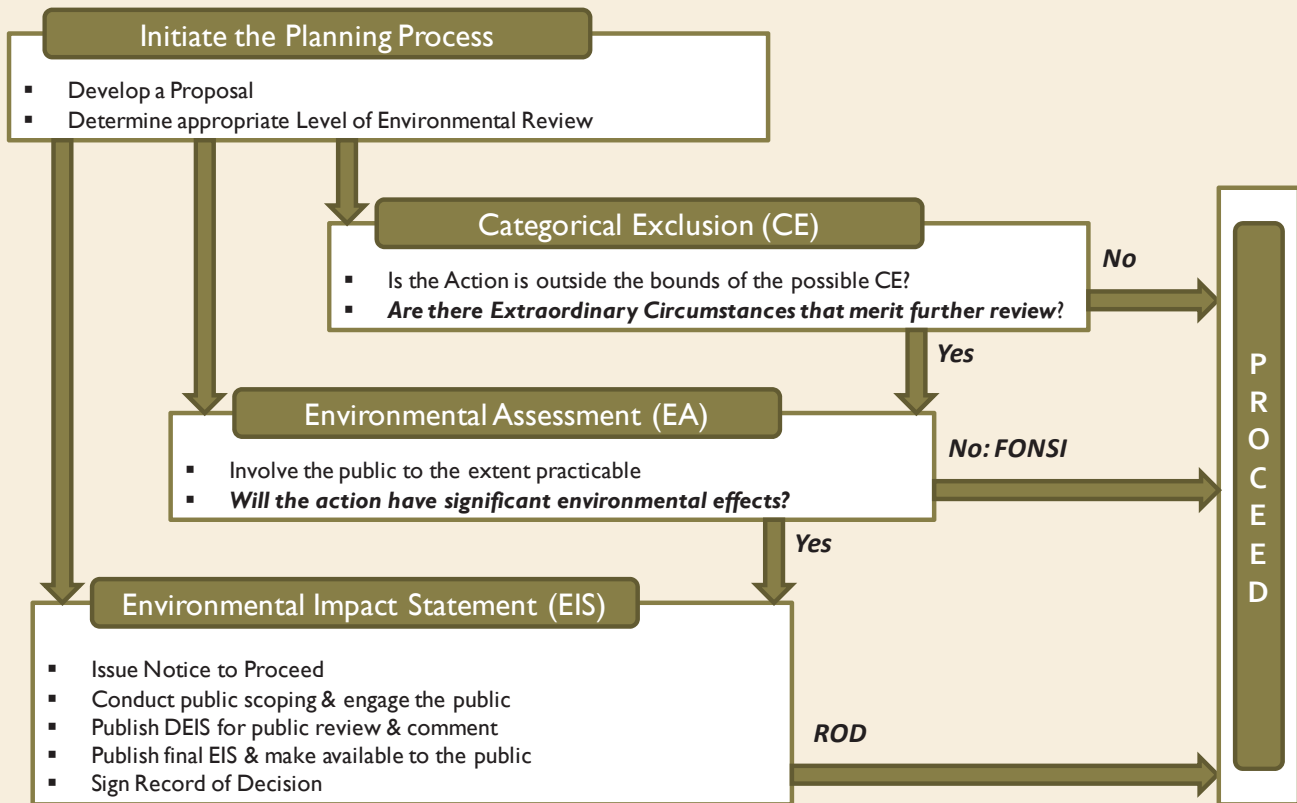
Congress enacted the National Historic Preservation Act in 1966, mandating that Federal decision makers consider historic properties during project planning. Section 106 of the NHPA requires Federal agencies to take into account the effects of undertakings they carry out, assist, fund, or permit on historic properties and to provide the ACHP a reasonable opportunity to comment on such undertakings.

Federal agencies meet this requirement by completing the Section 106 process set forth in the implementing regulations, “Protection of Historic Properties,” 36 C.F.R. Part 800. The goal of the Section 106 process is

to identify and to consider historic properties that might be affected by an undertaking and to attempt to resolve any adverse effects through consultation. The process provides for participation by SHPO, THPO, tribal, state, and local governments, Indian tribes and Native Hawaiian organizations, applicants for Federal assistance, permits, or licenses, representatives from interested organizations, private citizens, and the public. Federal agencies and consulting parties strive to reach agreement on measures to avoid, minimize, and mitigate adverse effects on historic properties and to find a balance between project goals and preservation objectives.

For more information, see: <http://www.achp.gov>

THE NEPA PROCESS



NEPA

The National Environmental Policy Act was signed into law on January 1, 1970. NEPA mandates that Federal agencies assess proposed Federal actions' environmental impacts, including impacts on historic and cultural resources. Federal agencies meet their NEPA review responsibilities by completing the NEPA processes set forth in their NEPA implementing procedures and CEQ's regulations, 40 C.F.R. Parts 1500-1508. There are three forms of NEPA review: Categorical Exclusion, Environmental Assessments, and Environmental Impact Statements.

CATEGORICAL EXCLUSION (CE)

A CE describes a category of actions that are expected not to have individually or cumulatively significant environmental impacts. Each agency's procedures for implementing NEPA sets out the agency's CEs, which are established after CEQ and public review. A proposed action within such a category does not require further review in an Environmental Assessment or an Environmental Impact Statement when there are no "extraordinary circumstances" associated with the site- or project-specific proposal that indicate further environmental review is warranted.

ENVIRONMENTAL ASSESSMENT (EA)

When a CE is not appropriate and the agency has not determined or is uncertain whether the proposed action will cause significant environmental effects, then an EA is prepared. If, as a result of the EA, a finding of no significant impact (FONSI) is made, then the NEPA review process is completed with the FONSI; otherwise an EIS is prepared.

ENVIRONMENTAL IMPACT STATEMENT (EIS)

NEPA and CEQ's regulations require the preparation of an EIS when a proposed Federal action may significantly affect the human environment. When an EIS is prepared, the NEPA review process is concluded when a record of decision (ROD) is issued. Historic properties, as a subset of cultural resources, are one aspect of the "human environment" defined by the NEPA regulations. Consequently, impacts on historic properties and cultural resources must be considered in determining whether to prepare an EIS.

For more information, see: <http://www.nepa.gov>

Most Federal agencies have their own implementing regulations or administrative protocols for implementing NEPA or approved program alternatives for Section 106. The advice provided in this handbook should serve as a foundation from which Federal agencies may develop or revise their own procedures or protocols to best suit their agencies' missions, their agencies' frameworks for implementing their programs, and their agencies' approaches to specific undertakings to satisfy the requirements of both Section 106 and NEPA.

Recently enacted legislation and administrative policies encourage agencies to seek new efficiencies in the environmental review process. Implementing the advice and recommendations made in this handbook can help agencies achieve these goals. It is important to recognize, however, that special circumstances may impact how an agency proceeds through NEPA and Section 106 compliance. For example, new legislation can change what an agency is required to do, litigation may inform agency procedures and policies, an agency may need to revisit determinations or decisions, or circumstances may dictate expedited timelines. These special situations can challenge agency decision makers in determining the best way forward. As such, CEQ and the ACHP are available to provide advice to agencies on a case by case basis as these situations arise.

III. RELATIONSHIP OF NEPA AND SECTION 106 REVIEWS

NEPA and Section 106 reviews may be triggered by a Federal or Federally funded, licensed, or permitted action and apply whether that action is on Federal, private, state, or tribal land. They share the goal of more informed agency decisions with respect to environmental consequences, including the effects on historic and cultural properties. Both encourage coordination with other environmental reviews.

NEPA and Section 106 implementation are overseen by Federal agencies that have promulgated regulations implementing the statutory procedures. The CEQ oversees 40 C.F.R. Parts 1500-1508, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act. The ACHP oversees 36 C.F.R. Part 800, Protection of Historic Properties. These regulations are similar in several respects. Both regulatory procedures:

- ▶ Authorize development of agency-specific alternative procedures provided those procedures meet certain standards and approval requirements.
- ▶ Require agencies to gather information on the potential effects of the proposed action on historic properties and consider alternatives that may avoid or minimize the potential for adverse effects.
- ▶ Vary depending on the scope of the proposed action and its potential to have environmental effects.
- ▶ Emphasize the importance of initiating the environmental review process early in project planning.
- ▶ Emphasize notifying the public about the proposed Federal actions and involving the public in the decision making process.
- ▶ Require the process to be completed prior to a Federal decision.

Distinctions exist between the NEPA and Section 106 reviews in terms of the types, scope, and geographical area of environmental review procedures, the nature of public engagement and tribal consultation, information requirements, procedures for developing alternatives,

documentation, and timing. These distinctions are important for understanding opportunities for coordination and for following the substitution process.

A. Action and Undertaking

An environmental review under NEPA is required for all “Federal actions” which include projects, plans, policies, and programs financed, assisted, conducted, regulated, or approved by Federal agencies. Federal agencies must comply with Section 106 for all “undertakings,” defined as “a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.”⁵ Under Section 106, if the agency determines that the undertaking is a type of activity that does not have the potential to cause effects on historic properties, then there is no further Section 106 responsibility.

B. Type of Review

Compliance procedures for NEPA and Section 106 vary depending on the potential of the proposed action to cause environmental effects. Federal agencies determine the type of NEPA review they will undertake for a proposed action based on the context and intensity of its impacts.⁶ Context is defined as the geographic and social context in which the effect will occur, while intensity refers to the severity of the impact. Agencies may meet their responsibilities with a Categorical Exclusion (CE), Environmental Assessment that results in a Finding of No Significant Impact, or Environmental Impact Statement and Record of Decision. CEs are agency-specific and require consideration of whether there are “extraordinary circumstances” in which a normally excluded action may have a significant environmental effect that will then require further analysis in an EA or an EIS.

Under Section 106, a Federal agency considers the potential effects of its undertaking on historic properties. When a Federal agency has found that an undertaking may adversely affect historic properties, it must develop and consider alternatives or measures to avoid, minimize, or mitigate such effects.⁷ The Section 106 process

TIP:

When a Federal agency makes its initial determination under Section 106, it considers whether the project is the type of activity that could affect historic properties, assuming such properties were present. This evaluation must be independent of the real context (e.g., actual location) for the activity. The Federal agency should never proceed on the assumption that the potential to affect historic properties is absent based on location, previous disturbance, or because no historic properties are believed to be present in the area. Such findings should be subject to the Section 106 notification and consultation provisions.

36 C.F.R. § 800.3(a)(1)

If a project, activity, or program is categorically excluded from NEPA review under an agency's NEPA procedures, the agency official shall determine if it still qualifies as an undertaking requiring review under Section 106.
36 C.F.R. § 800.8(b)

TIP:

NEPA and NHPA are statutory requirements that can be waived only by specific provision in an Act of Congress. Unless a waiver has been authorized in legislation, the administrative record for each Federal project or program should document compliance with NEPA and NHPA.

NEPA REVIEW AND TIERING

The NEPA regulations at 40 C.F.R. §§ 1502.4(c), 1502.20, and 1508.28, and CEQ guidance (“Improving the Process for Preparing Efficient and Timely Environmental Reviews under the National Environmental Policy Act”) encourage agencies to tier their EAs and EISs to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review. Whenever a broad EA or EIS has been prepared, such as a program or policy statement, and a subsequent EIS or EA is then prepared on an action included within the entire program or policy, such as a site specific action, the subsequent EIS or EA need only summarize the issues discussed in the broader EIS or EA by incorporation by reference and shall concentrate on the issues specific to the subsequent action. Materials incorporated by reference must be briefly described and appropriately cited, and available for review by interested parties.

For more information, see CEQ’s Memorandum for Heads of Federal Departments and Agencies, “Improving the Process for Preparing Efficient and Timely Environmental Reviews under the National Environmental Policy Act” (March 6, 2012), *available at* http://ceq.hss.doe.gov/current_developments/docs/Improving_NEPA_Efficiencies_06Mar2012.pdf.

SECTION 106 AGREEMENTS

A Memorandum of Agreement is used to resolve adverse effects to historic properties and conclude the Section 106 process when implementing a discrete project with identified adverse effects. A Programmatic Agreement is a program alternative that may be used to implement the Section 106 process for a complex project situation. Programmatic Agreements can be developed on a national, statewide, or regional scope for similar or repetitive undertakings, for undertakings with repetitive effects on historic properties, or for situations where the effects to historic properties cannot be fully determined prior to the approval of an undertaking.

normally concludes with an agency finding of “no historic properties affected,” “no adverse effect,” or “adverse effects” resolved through avoidance, minimization, or mitigation. For undertakings with adverse effects, the Federal agency usually executes a legally binding document, a Memorandum of Agreement (MOA) or Programmatic Agreement (PA), that stipulates the resolution of adverse effects agreed to by the signatories. In those rare circumstances where there is a failure to reach an agreed-upon solution, the ACHP issues formal advisory comments to the head of the agency. The head of the agency must then take into account and respond to those comments.⁸

C. Scope of Review

Environmental review under NEPA includes a description of the affected human environment and the environmental consequences of the proposed action on that environment. NEPA regulations require NEPA documents to list all Federal permits, licenses, and other entitlements and to integrate to the fullest extent possible its information gathering and analyses with other Federal environmental review laws and executive orders—such as the Endangered Species Act (ESA), Clean Air Act General Conformity Rule, and the Marine Mammal Protection Act. As a result, NEPA is sometimes referred to as “an umbrella law.” Nevertheless, agencies must still fulfill the requirements under those independent statutes, including the NHPA. Both NEPA and Section 106 require agencies to consider historic properties and effects to them. The affected human environment reviewed under NEPA includes aesthetic, historic, and cultural resources as these terms are commonly understood, including such resources as sacred sites. Section 106 is concerned exclusively with impacts to historic properties, defined in NHPA⁹ as properties that are listed, or may be eligible for listing, in the National Register of Historic Places (National Register).¹⁰ These may include prehistoric or historic districts, sites, buildings, structures, objects, or properties of traditional religious and cultural importance to an Indian tribe or a Native Hawaiian organization, that meet the National Register criteria.¹¹ Cultural resources that are not eligible

for or listed in the National Register may be considered as part of the NEPA review.

D. Study Area and Area of Potential Effects

The NEPA review's study area will vary depending on the extent of the potential impacts associated with the alternative courses of action. If reasonable alternatives exist, NEPA requires agencies to rigorously explore and objectively evaluate them.¹² Agencies should give a similar level of attention to historic properties as that given to other resources for all alternatives to establish a baseline of information to consider during consultation and review. Section 106 requires agencies to identify historic properties within the area of potential effects¹³ for the proposed undertaking. In practice, the preferred alternative in a NEPA review may be considered equivalent to the proposed undertaking under Section 106. Early in the Section 106 review process, the Federal agency determines the area of potential effects for its undertaking. The area of potential effects is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The Section 106 process does not require agencies to identify and evaluate historic properties in the area of potential effects for all NEPA alternatives; however, the preferred alternative may not be selected until late in the NEPA review, or may change during that review. In addition, Section 106 may require additional identification of historic resources as part of an effort to develop and evaluate alternatives to the proposed undertaking to avoid or mitigate adverse effects. Agencies should therefore establish the schedule, geographic area, and specifications for specialized studies, including historic property surveys, for more than the preferred alternative when there are adverse effects, to have the information they need in each step of the NEPA and Section 106 processes.

Section 106 allows the identification and evaluation of historic properties and assessment of effects to be phased for large land areas or in cases of restricted access. In some circumstances, the agency may defer identification, evaluation, and assessment of effects through a formal agreement, such as a PA. As specific aspects or locations



The Department of Veterans Affairs (VA) lost its Veterans Medical Center in New Orleans as a result of Hurricanes Katrina and Rita in 2005. It proposed to replace the facility with a new facility, adjacent to the proposed replacement for the public Charity Hospital, which would be partially funded by the Federal Emergency Management Agency (FEMA). VA, FEMA, and the City of New Orleans (as the responsible entity for NEPA under HUD delegation) cooperated to conduct a programmatic (or tier 1) Environmental Assessment (PEA) for siting the two hospitals together in the Mid-City Historic District. Since the agencies did not wish to identify a preferred alternative prior to issuing the PEA, the Section 106 Programmatic Agreement was developed to address the potential adverse effects of each of the alternatives under study.

Since the approval of the programmatic Finding of No Significant Impact (FONSI) in 2007, each of the agencies have completed their own site-specific (or tier 2) Environmental Assessments.

VA issued a mitigated FONSI in November 2008, and reports that its effort to satisfy the Programmatic Agreement is roughly 90 percent complete as of February 2013.

For more information and updates, go to:

http://www.neworleans.va.gov/Project_Legacy.asp

<http://www.fema.gov/environmental-planning-and-historic-preservation-program/environmental-documents-public-notice-2>

TIP:

An “effect” under Section 106 means an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register of Historic Places. A Federal agency must assess the effects of the proposed undertaking on historic properties prior to applying the criteria of adverse effect.

PARTICIPANTS IN THE SECTION 106 REVIEW PROCESS

The regulations implementing Section 106, “Protection of Historic Properties” (36 C.F.R. Part 800), require Federal agencies to consult—seek, discuss, and consider the views and seek agreement with—the following stakeholders:

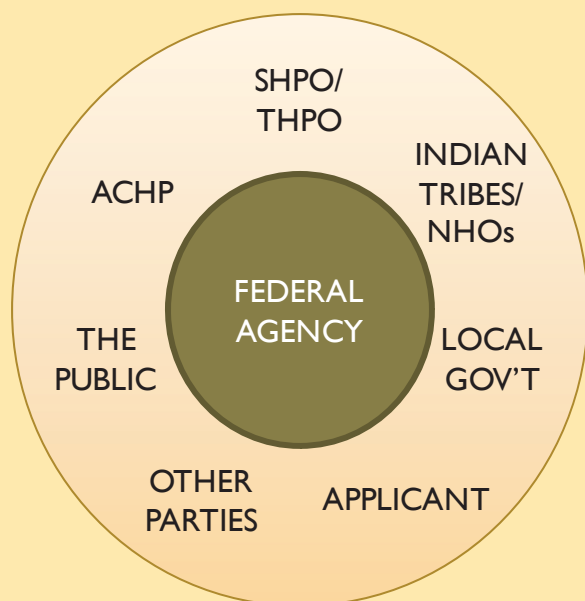
- ▶ State and Tribal Historic Preservation Officers (SHPOs/THPOs)
- ▶ Federally recognized Indian tribes, including Native villages, Regional Corporations or Village Corporations, as those terms are defined in Section 3 of the Alaska Native Claims Settlement Act, and Native Hawaiian organizations (NHOs)
- ▶ Local governments
- ▶ Applicants for Federal permits, licenses, or assistance
- ▶ The National Park Service, if a National Historic Landmark may be affected by the undertaking
- ▶ The ACHP, if historic properties may be adversely affected or other circumstances warrant its participation

Federal agencies may also invite other consulting parties with a legal or economic relation to the undertaking or affected properties or concern with the undertaking’s effects on historic properties.

The views of the public are also essential to informed Federal decision making in the Section 106 process.

For more information, go to:

<http://www.achp.gov>



of an alternative are refined or access is gained, the agency should complete its efforts to identify and evaluate the potential effects to historic properties.

E. Stakeholder and Public Involvement

CEQ’s NEPA regulations require agencies to “make diligent efforts to involve the public in preparing and implementing their NEPA procedures” and “to provide public notice of NEPA-related hearings, public meetings, and the availability of environmental documents.”¹⁴ The extent will vary with the level of review. CEs provide limited opportunities for public and tribal involvement. Where an EA is prepared, the type and extent of public involvement is at the discretion of the authorized officer. For an EIS, scoping involves notification and opportunities for comments on a proposed action by other agencies, organizations, tribes, local governments, and the public for the purpose of determining the scope of issues and identifying significant issues related to the proposed action. Agencies are required to make the draft EIS available for public review, invite comments, and respond to any comments submitted. In addition, a Federal, state, local, and tribal government with jurisdiction or special expertise may be offered a special role as a “cooperating agency.”

Section 106 requires that agencies “provide the public with information about an undertaking and its effects and seek public comment.”¹⁵ The manner in which the agency official is to seek and consider the views of the general public should reflect “the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties, confidentiality concerns of private individuals and businesses, and the relationship of the Federal involvement in the undertaking.”¹⁶

Agencies should plan public involvement appropriate to the scale of the undertaking and scope of Federal involvement.¹⁷ Section 106 encourages agencies to use their own procedures implementing NEPA or other programs to satisfy the Section 106 general public outreach requirements, provided they include adequate opportunities for public involvement.¹⁸

In addition to requiring public involvement, Section 106 is a consultative process that “seeks to accommodate historic preservation concerns with the needs of the Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties.”¹⁹ Consulting parties include other Federal, state, and local agencies, Indian tribes, Native Hawaiian organizations, applicants, and the interested public. Consultation is defined in the Section 106 regulations as “the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process.”²⁰ The consultation process is used to identify and evaluate historic properties potentially affected by an undertaking, assess effects, and seek ways to avoid, minimize, or mitigate any adverse effects on those properties. Consulting parties are provided a more active role in these steps than the general public.

An agency should consider the implications for their communications strategy when determining whether to use coordination or substitution. When agencies plan to fulfill NEPA requirements for a proposed action through the preparation of CEs or EAs, Section 106 may require more public involvement than that afforded by the NEPA review. More public involvement may also be required when preparing an EIS, particularly when using the substitution process. Effective communications plans for engaging stakeholders and the public should satisfy all the NEPA review and Section 106 public involvement and consultation requirements.

F. Tribal Consultation

Under NEPA, Federal agencies are encouraged to consult with Indian tribes early in the planning process, and to invite Indian tribes to be cooperating agencies in preparation of an EIS, when potential effects are on a reservation or affect tribal interests.²¹ Tribal consultation under NEPA can include effects to treaty, trust, and other natural resource issues, as well as to cultural resources in general, whether or not they meet the specific definition of historic property under the NHPA. The NEPA review may also include the government’s responsibilities under Executive Order (EO) 12898,

FEDERALLY RECOGNIZED INDIAN TRIBES

The Federal Government has a unique relationship with Indian tribes derived from the Constitution of the United States, treaties, Supreme Court decisions, and Federal statutes. Consultation with an Indian tribe must recognize the government-to-government relationship between the Federal Government and Indian tribes, and should be conducted in a sensitive manner respectful of tribal sovereignty. [36 C.F.R. § 800.2(c)(2)(ii)(B) and (C)]

NATIVE HAWAIIAN ORGANIZATION

An Native Hawaiian organization is any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are culturally significant to Native Hawaiians. The term includes, but is not limited to, the Office of Hawaiian Affairs of the State of Hawaii and Hui Malama I Na Kupuna O Hawai’i Nei, an organization incorporated under the laws of the State of Hawaii. The NHPA requires the agency official to consult with any Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking. [36 C.F.R. § 800.2(c)(2)(ii) and § 800.16(s)(1)]

TIP:

The development of consultation protocols or communication agreements between a Federal agency and an Indian tribe or Native Hawaiian organization may help focus consultation and create common expectations.

INVOLVING CONSULTING PARTIES IN NEPA

A Section 106 review should begin prior to a Federal agency's identification of a preferred alternative under NEPA. While many SHPOs, THPOs, Indian tribes, and NHOs may find early involvement in the NEPA process challenging, it is important that agencies engage these Section 106 consulting parties early in project planning. Their involvement in the development of alternatives and consideration of historic preservation issues will benefit both the NEPA and the Section 106 processes. The development of alternatives which resolve adverse effects and prevent the need to review or revisit previously eliminated alternatives advances environmental reviews.

ENVIRONMENTAL JUSTICE

Environmental justice issues encompass a broad range of impacts covered by NEPA, including impacts on the natural or physical environment and interrelated social, cultural, and economic effects. In Section 106 consultations, representatives of affected communities may also raise environmental justice issues. Such issues which can be addressed through historic preservation considerations may contribute to the agency's overall environmental justice compliance.

Section 304 of the NHPA provides that the head of a Federal agency or other public official receiving grant assistance pursuant to the act, after consultation with the Secretary of the Interior, shall withhold from public disclosure information about the location, character, or ownership of a historic property when disclosure may cause a significant invasion of privacy, risk harm to the historic property, or impede the use of a traditional religious site by practitioners.

36 C.F.R. § 800.11(c)(1)

Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations; EO 13175, Consultation and Coordination with Indian Tribal Governments; the American Indian Religious Freedom Act; and related statutes and policies that have a consultation component.

Under the NHPA, consultation with Indian tribes and Native Hawaiian organizations is mandatory. It focuses on identifying and evaluating historic properties, assessing effects, and, where appropriate, resolving adverse effects to those properties. Consultation is required with any Indian tribe or Native Hawaiian organization that may attach religious and cultural significance to historic properties that may be affected by a proposed undertaking, regardless of whether the property is located on or off tribal lands.²²

G. Information Requirements

The CEQ regulations require agencies to describe the environment, including cultural resources, likely to be affected by the proposed action and alternatives, and to discuss and consider the environmental effects of the proposed action and alternatives, so decision makers and the public may compare the consequences associated with alternate courses of action. Data and analysis vary depending on the importance of the impact, and the description should be no longer than necessary to understand the effects of the alternatives, with less important material summarized, consolidated, or referenced.²³

Section 106 requires agencies to make a reasonable and good faith effort to identify historic properties. The level of effort is determined in consultation with the SHPO or the THPO. Agencies take into account information provided by consulting parties, individuals, organizations, tribes, and Native Hawaiian organizations about the location, character, and ownership of historic properties. They also consider past planning efforts and research, the magnitude and nature of the undertaking, the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects. Information about the location, character, or

ownership of historic properties, may be subject to the confidentiality provisions of Section 304 of the NHPA. Further, it may be necessary to withhold protected business analysis where the project sponsor or applicant wants to keep competitive information confidential. The request for confidentiality is often made early in the consultation process. It is important for an agency to carefully review solicitations and information that would be released or made available to the general public to ensure confidential information is protected as appropriate.

H. Documentation

At the end of the NEPA and Section 106 reviews, Federal agencies select an alternative to implement. The NEPA review may conclude with documentation of a CE, a FONSI for EAs, or a ROD for EISs, or a No Action decision. Only the ROD is a decision document under the CEQ regulations.²⁵ The Section 106 process normally concludes with documentation of one of three findings: “no historic properties affected,” “no adverse effect,” or “adverse effect” to historic properties that the Federal agency has resolved through the measures they have agreed to in an MOA or PA.²⁶ In rare circumstances, an agency is unable to resolve adverse effects, terminates consultation, and requests the ACHP to issue formal advisory comments.²⁷ The agency head then concludes the process by providing the ACHP with a summary of its decision and evidence of consideration of the ACHP’s comments prior to reaching a final decision on the undertaking.²⁸ Copies of the agency’s response and summary are provided to consulting parties and made available to the public. By statute, Federal agencies must conclude the Section 106 process before approving the expenditure of funds on an undertaking or before the issuance of any license, permit, or approval for an undertaking to proceed.²⁹ This requirement does not apply to the use of funds for non-destructive planning, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize, or mitigate the undertaking’s adverse effects on historic properties.³⁰

Applicants are likely to carry out a significant amount of the work including the following: gathering and providing

baseline information on resources that may be impacted by the proposed action; administrative and technical facilitation of public engagement and tribal consultation; and helping to prepare or review draft documentation. Officials may authorize an applicant to initiate consultation with the SHPO/THPO and other consulting parties with the exception of Indian tribes by notifying the SHPO/THPO.³¹ This delegation authority does not extend to an agency’s government-to-government relationship with Indian tribes. The Federal agency alone is responsible for all findings and determinations under Section 106, and for government-to-government consultation with Indian tribes.

PROGRAM ALTERNATIVES FOR SECTION 106

Federal agencies may develop other “Program Alternatives” to fulfill their Section 106 compliance responsibilities. The Section 106 regulations outline options including the following: nationwide, regional, or complex project Programmatic Agreements; prototype Programmatic Agreements; exemptions; standard treatments; and program comments. Program Alternatives can be used to tailor the Section 106 review process to meet the needs of a particular Federal project or program.

For more information, see:

<http://www.achp.gov>

PROGRAMMATIC AGREEMENTS

A Programmatic Agreement is a flexible tool that allows agencies to tailor the Section 106 process to their program or series of undertakings. A Programmatic Agreement may be helpful when an agency is developing a programmatic EA or EIS to establish a process for concluding future consultation and considering effects to historic properties. Consulting party involvement in the development of a Programmatic Agreement enables the Federal agency to identify major policy and historic preservation issues and focus consultation in relevant areas.

For example, a Programmatic EA and related Section 106 Programmatic Agreement were successfully developed to address environmental issues in recovery activities related to Hurricanes Rita and Katrina in Louisiana. For more information about FEMA’s historic preservation program, see <http://www.achp.gov/fema.html>.

For more information about Section 106 Programmatic Agreements, see

<http://www.achp.gov>

IV. ROAD MAP FOR COORDINATION

Coordinating the Section 106 and NEPA reviews is most effective when the responsible parties begin them simultaneously so that each process will fully inform the other. The general principles in 36 C.F.R. § 800.8(a) provide a framework for this coordination. The following section provides advice for putting those principles into practice for each level of NEPA review.

The initiation of the environmental review process is a critical part of planning a proposed action. The objectives and goals of the proposed action are usually outlined at this stage, and the agency begins to identify the potentially impacted resources and those entities and individuals that have an interest in the action or its potential effects. Agencies may be able to identify whether the proposed action meets the regulatory definition of undertaking and has the potential to cause effects on historic properties. If the action is not an undertaking with such potential, the agency has no further Section 106 responsibilities and should include this determination in the NEPA documentation.

Opportunities for Coordination:

- ▶ Begin both NEPA and Section 106 reviews early in project planning so each process can inform the other.
- ▶ Plan public involvement to satisfy both NEPA and Section 106 requirements.

A. Categorical Exclusions

The majority of Federal actions reviewed under NEPA qualify for a CE. A CE is established administratively as part of an agency’s NEPA implementation procedures. It is specific to an agency’s programs and is based on an agency’s determination that the activities described in the CE typically do not have any potential for significant effects. A CE can be used to satisfy NEPA requirements for a proposed action when that action is described by the CE and the agency determines that there are no “extraordinary circumstances” that would warrant further analysis in an EA or EIS.³² Because Section 106 is an independent statutory requirement, compliance with

NEPA through a CE does *not* satisfy an agency's obligations under Section 106 of the NHPA.³³

If the proposed action is a type of undertaking with the potential to affect historic properties, the agency initiates the Section 106 consultation process by identifying the appropriate SHPO/THPO and other parties with an interest in the effects of the undertaking on historic properties, and consults to determine the area of potential effects, and the scope of identification efforts, consistent with 36 C.F.R. Part 800. The Section 106 consultation can assist an agency in determining whether “extraordinary circumstances” related to historic properties are present. “Extraordinary circumstances,” in which a normally excluded action may have a significant environmental effect, typically consider the “degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.”³⁴

When the Section 106 process concludes there are no historic properties present in the area of potential effects for the proposed action or that the proposed action will have no effect or no adverse effect to historic properties, the agency may proceed with the CE, if there are no other extraordinary circumstances, after documenting completion of its Section 106 requirement. However, if an agency determines there may be adverse effects to historic properties, it must consider whether the adverse effects constitute “extraordinary circumstances” that merit further analysis in an EA or EIS, either alone or in combination with other environmental effects. When the agency resolves the adverse effects to historic properties through the Section 106 process by avoiding, minimizing, or mitigating them such that the potential adverse effects no longer constitute “extraordinary circumstances,” it may still meet its NEPA responsibilities through a CE. The agency documents the Section 106 analysis to support the application of the CE, and the Section 106 analysis should be completed before or concurrent with the use of a CE. If an agency uses CE documentation as its decision document and the proposed action constitutes a type of undertaking with the potential to



Congress has delegated the responsibility to comply with NEPA and Section 106 for certain programs of the Department of Housing and Urban Development (HUD) to the state and local governments which receive HUD funds, such as Community Development Block Grants (CDBG). In order to use CDBG funds to demolish a derelict structure or to design infill redevelopment in a blighted neighborhood, local governments must comply with Section 106 and NEPA. Many state and local governments have executed Programmatic Agreements which tailor the Section 106 review process to their HUD-delegated programs.

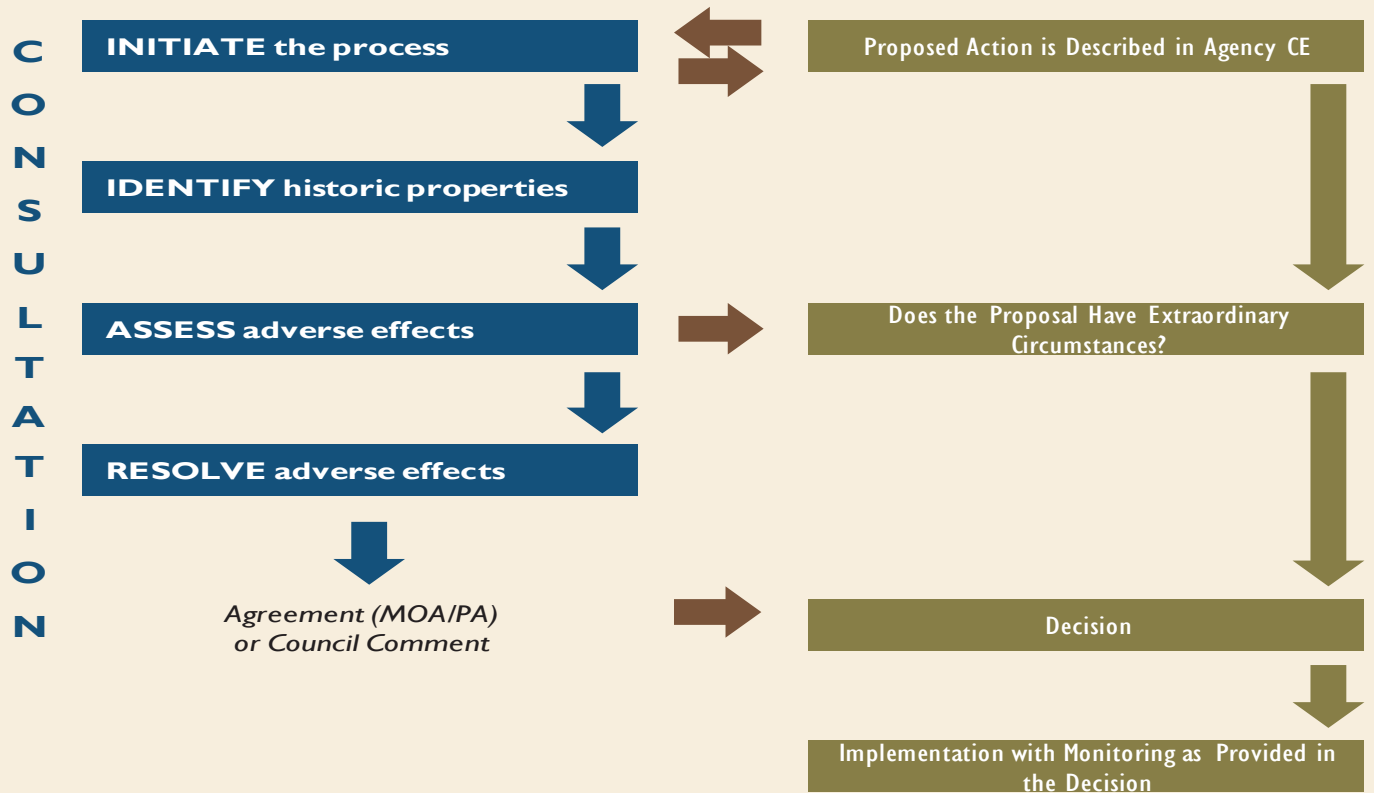
To review examples of these Section 106 Programmatic Agreements, go to:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/environment/section106

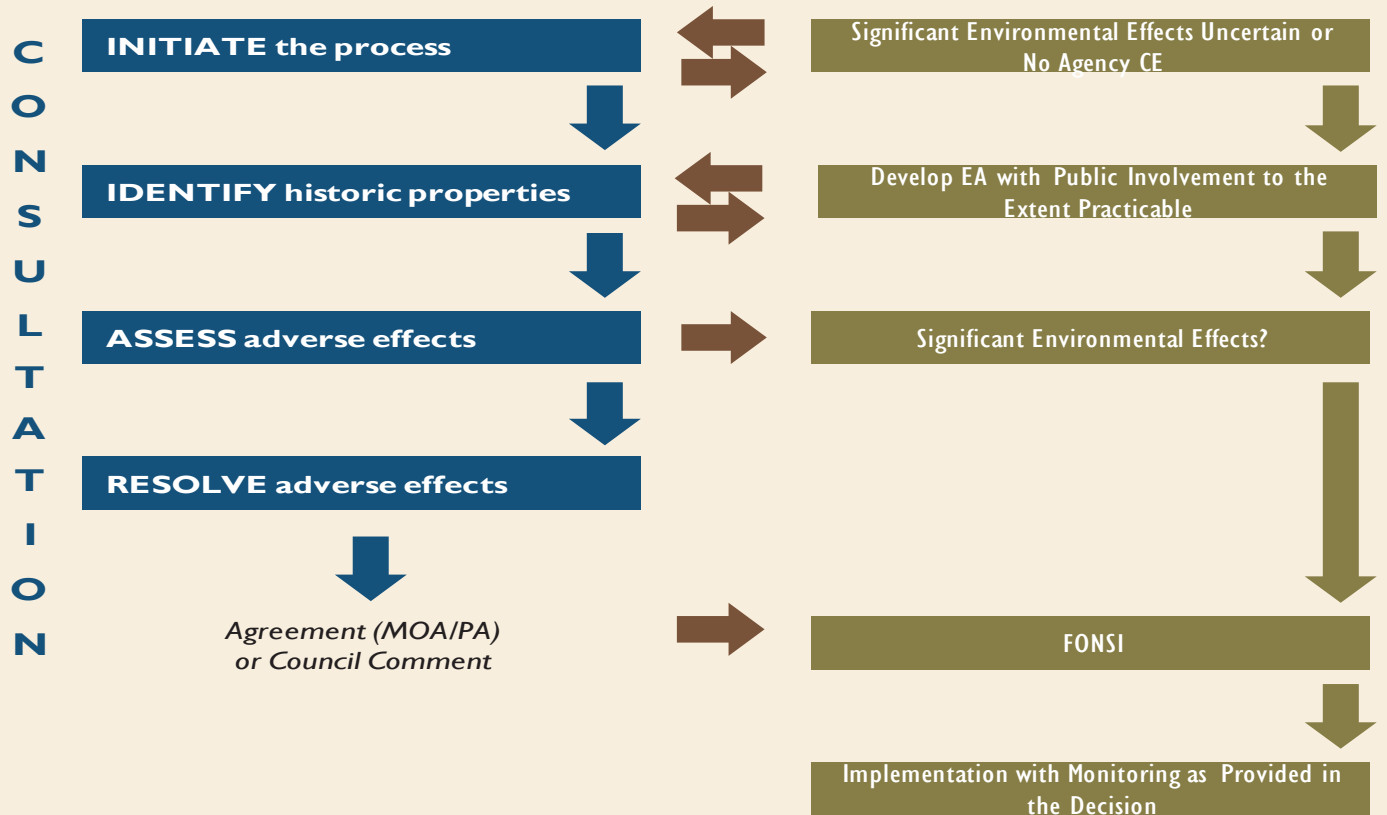
TIP:

Federal agencies can facilitate the early involvement of consulting parties by highlighting the relevant parts of the NEPA document that address the Section 106 process and historic preservation concerns.

TIMING AND COMMUNICATION SECTION 106 AND CE



SECTION 106 AND EA

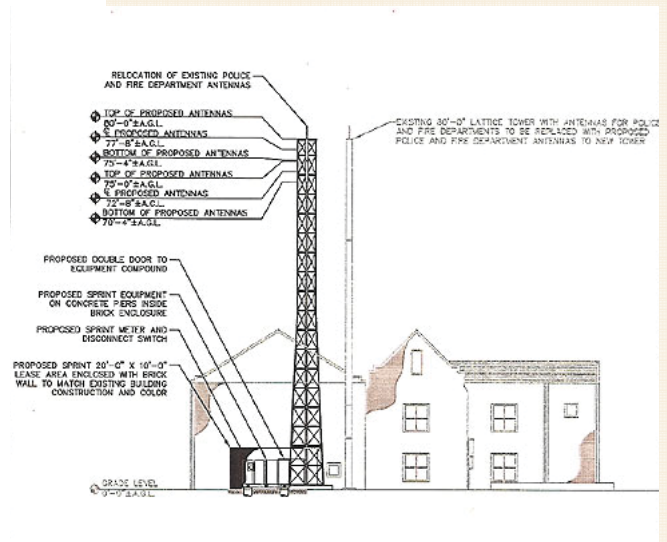


Note these graphics present generic depictions of the two review processes.

affect historic properties, then it would have to wait until the Section 106 process was concluded to issue such a CE document.

Opportunities for Coordination:

- ▶ Synchronizing NEPA and Section 106 reviews can allow potential adverse effects to be avoided, minimized, or mitigated and documented so that a CE can be applied.
- ▶ The Section 106 process can identify those circumstances in which the adverse effects to historic properties, individually or in combination with other potential effects, constitute “extraordinary circumstances” such that application of a CE is not appropriate, and additional NEPA analysis is required.



B. Environmental Assessments

When a CE is not appropriate and the agency has not determined that a proposed action has the potential to cause “significant environmental effects” requiring an EIS, the agency prepares an EA. An EA is typically a concise public document that provides sufficient evidence and analysis for determining whether to prepare an EIS or FONSI.³⁵ The EA includes brief discussions of the need for the proposed action, the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted. It includes the development and description of appropriate reasonable alternatives for proposals that involve unresolved conflicts concerning alternative uses of available resources. If the result of the EA is a FONSI, then the NEPA review process is complete; otherwise, an EIS is prepared or the proposal is not advanced.

1. Preliminary Analysis

During initial project formulation, the agency identifies the SHPO/THPO, Indian tribes and Native Hawaiian organizations, and other parties who may be concerned with the effects of the proposed action and its potential to affect historic properties.³⁶ Initiation of Section 106 consultation on an undertaking’s area of potential effects and the identification of any historic properties that might be located within this geographically designated area can assist the agency in refining the issues for analysis and the

In 2001 and 2004, the Federal Communications Commission (FCC) executed nationwide Programmatic Agreements (NPAs) to streamline the Section 106 review of the proposed collocation of wireless antennae on existing tower facilities and the proposed construction and modification of certain wireless communications tower facilities. Concurrently, the FCC amended its regulations at 47 C.F.R. § 1.1307(a)(4) to state that new facilities that may affect historic properties, as determined through the Section 106 review process, are “actions that may have a significant environmental effect, for which Environmental Assessments (EAs) must be prepared.” New facilities and collocations that do not affect historic properties may be categorically excluded from NEPA.

To learn more about the NPAs and the FCC regulations, go to:

<http://wireless.fcc.gov/siting/npa.html>

RESPONSIBLE PARTIES AND APPLICANTS

Federal agencies are responsible for complying with NEPA and Section 106. Other “responsible parties”- such as state or local governments, tribal governments, or applicants for Federal licenses, permits, or approvals- may be delegated the authority to complete certain agency obligations. Even where a delegation is not authorized, a Federal agency may use information, analyses, and recommendations prepared by these parties in the NEPA and Section 106 processes. The Federal agency remains responsible for NEPA and Section 106 findings, determinations, and government-to-government consultation with Federally recognized Indian tribes.

[36 C.F.R. § 800.2(a)(3)]

TIP:

When working with applicants, project sponsors, and consultants, Federal agencies should communicate with them early and clearly define the scope of the project, roles and responsibilities for both NEPA and Section 106 review, timelines, and information sharing. Early involvement means before major decisions are made about the planning process and preferred alternatives are selected.

scope of NEPA review. This includes the assessment of how alternatives to avoid, minimize, or mitigate potential adverse effects to historic properties will be considered in the NEPA review.

2. Plan to Involve the Public

Some form of public involvement is required for an EA; however, the type and extent of outreach is up to the discretion of the authorized agency official. Examples of public involvement include external scoping, public notification before or during preparation of the EA, public meetings, or public review and comment on the draft EA. Section 106 requires both public involvement and consultation with the SHPO and/or THPO and other consulting parties. A comprehensive communications plan that includes NEPA public involvement, any additional public involvement requirements under Section 106, Section 106 consultation requirements, and additional tribal consultation requirements will help meet the public engagement responsibilities with less duplication of effort. A good plan will include information on the background and context for the project, the agency points of contact, stakeholders, and scheduling milestones. Having a clear communications plan for all public outreach in the beginning of the project review will make the overall decision making process more transparent and provide a better opportunity for interested members of the public to contribute to the body of information assessed.

3. Preparing the EA

The Federal agency may assess the environmental impacts of the proposed action and alternatives in the EA concurrent with the potential effects of the action on historic properties. The assessment of effects to resources under an EA includes the Section 106 focus on which part of the proposed action could specifically affect a historic property and describes how the resource might be affected.

When considering effects on historic properties in the Section 106 process, the assessment should similarly focus on what aspect of the proposed undertaking would affect the historic property and what character-defining features of the historic property would be affected. Adverse effects are found when an undertaking might

alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.³⁷

To coordinate Section 106 and an EA, an agency would use the Section 106 adverse effect criteria in evaluating and describing effects on historic properties. Agencies may also find it helpful to relate adverse effects under Section 106 to the criteria for determining the significance of impacts under NEPA. One approach to assessing the impacts to historic properties, as relative to the scope of the EA, is to consider the importance of the resource as its "context" and the severity of the proposed impacts as the action's "intensity."³⁸ Historic preservation professionals generally recognize that adverse effects are often complex and varied. Federal agencies should clearly define the specific characteristics that make an individual property or district eligible for the National Register to determine whether an action might alter, directly or indirectly, those qualifying characteristics in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association, and thus, to determine the severity of impacts to that historic property.

Agencies should take particular care when the proposed undertaking will affect types of historic properties whose boundaries might not be well defined or include natural features. The intensity of the action's effect on a property such as a cultural landscape or historic property of religious and cultural significance to Indian tribes or Native Hawaiian organizations might not be as immediately apparent as it would be when considering effects on a discrete structure or archaeological site. The intensity of the proposed action in these situations is likely to affect the more intangible aspects of the property, such as "feeling" as this term is used in the criteria for evaluating properties for the National Register. Consultation with Indian tribes and Native Hawaiian organizations to identify the character-defining features of such a cultural landscape is vital.



Traditional cultural landscapes describe an area considered to be culturally significant. They can and often do embrace one or more of the property types defined in the NHPA: districts, buildings, structures, sites, and objects. It is important to note that the challenges associated with the management of such sites, and their potential size, do not excuse the consideration of their significance. (Image: Sacred Sand Dunes in Monument Valley, © Sergey Yasny - Fotolia.com)

TIP:

When a project for which an agency has completed NEPA and Section 106 processes is delayed a long time or requires changes, the agency should re-engage consulting parties and provide them with new or updated information. An agency may need to reinitiate Section 106 consultation if the nature of the effects to historic properties have changed during this period. This information will also inform the agency's determination whether to supplement the NEPA review.

WHAT IS MITIGATION?

In the Section 106 process, the term “mitigate” is distinct from the terms “avoid” and “minimize,” and means to compensate for the adverse effects to historic properties. In the NEPA environmental review process, the term “mitigate” includes avoiding, minimizing, reducing, as well as compensating for the impact to the human environment.

Understanding the similarities and differences between the terminology in Section 106 and NEPA is crucial to coordinate the two processes.

See [Attachment A](#) for a comprehensive comparison of terms and definitions.

TIP:

When the Section 106 process results in a finding of adverse effects to historic properties and mitigation measures are proposed through the development of a Section 106 agreement document, the NEPA review process may conclude with an EA and FONSI, or may require the development of an EIS and ROD.

The Section 106 documentation should have the length, detail, and technical information necessary to provide sufficient information to consulting parties about the nature of the historic properties involved and the reasoning behind the effect findings.³⁹ To communicate Section 106 information in the EA and FONSI, agencies may list consulting parties, outline findings and determinations, and briefly describe consulting party meetings. Tables and charts might be helpful to identify historic properties within the area of potential effects and organize descriptions of National Register eligibility, potential effects, and proposed treatment or mitigation measures. Because this information is generally presented in a summary format in the EA, agencies and applicants are encouraged to append or incorporate by reference those documents, findings, analyses, and letters developed or produced for the Section 106 process, particularly correspondence from the SHPOs and THPOs. In the EA, the agency should identify where the Section 106 findings and determinations are located to allow for easier reference and review, and consider using joint mailings that meet Section 106 consultation requirements.

The EA provides opportunities for considering mitigation measures that will avoid, minimize, rectify, reduce, eliminate over time, or compensate for adverse effects.⁴⁰ In the NEPA context, the term “mitigation” can refer to changes in the project that would lessen the overall impact to the human environment. A FONSI can be based on mitigation that would reduce the impacts of an action below the threshold of NEPA significance.⁴¹ The term “mitigation” in Section 106 refers to measures to resolve the adverse effects to identified historic properties. If adverse effects cannot be avoided or minimized, then the Federal agency seeks other ways to mitigate those effects to historic properties.⁴² Such measures might include redesign of new buildings, modification of site plans, realignment of corridors or rights of way, documentation, or preservation-in-place of certain historic properties. Any treatment and mitigation measures developed through the Section 106 process should be referenced in the EA and documented in an MOA or PA developed in consultation with consulting parties. For example, drafts of agreement documents

may be included as appendices to a draft EA and attached to a final EA or FONSI to document how the agency intends to fulfill its Section 106 responsibilities. Agencies that use a FONSI as a decision document for an undertaking must conclude the Section 106 process prior to issuing the FONSI.

4. FONSI or EIS?

The resolution of adverse effects to historic properties through the Section 106 process is a factor to consider in determining whether, for NEPA purposes, there are any potentially significant effects that require the preparation of an EIS. An adverse effect in the Section 106 process does not necessarily mean an agency will be unable to reach a FONSI. The Section 106 regulations state that the NEPA determination of whether an undertaking is a “major Federal action significantly affecting the quality of the human environment” that requires preparation of an EIS should include consideration of the likely effects on historic properties.⁴³ However, neither NEPA nor Section 106 requires the preparation of an EIS solely because the proposed undertaking has the potential to adversely affect a historic property.⁴⁴ Consequently, the agency will still need to determine whether the environmental effects of the action on historic properties are “significant” (or are still “significant”) within the meaning of 40 C.F.R. § 1508.27.

Opportunities for Coordination:

- ▶ Incorporate Section 106 and the EA process, including tribal consultation, into an overall project schedule that includes milestones and a tracking system.
- ▶ Develop a comprehensive communication plan for the EA, Section 106, and consultation requirements.
- ▶ Include current project descriptions in all staff level and government-to-government consultation meetings.
- ▶ Include a statement in any public notice about the project that the agency intends to comply with Section 106 as well as EA public notification requirements.
- ▶ Ensure all public communications and the EA include Section 106 information.
- ▶ Where adverse effects to historic properties are avoided, minimized, or mitigated, a FONSI may be appropriate to conclude the EA process.



The General Services Administration (GSA) received authorization and an appropriation to acquire a site and design a new \$100 million, 262,970 square foot Federal courthouse in Harrisburg, Pennsylvania. GSA published its Environmental Assessment (EA) that identified three site alternatives, all of which would adversely affect historic properties. The Bethesda Mission, pictured here, was one historic property that would have been adversely affected. Due to historic preservation and other community concerns, GSA determined that none of the three sites would be selected. GSA then released a revised site selection study, considering three new sites and published a new EA that selected a site at North 6th and Reily Streets, which is adequate for the courts, serves the needs of the community, and avoids adverse effects to historic properties. The Finding of No Significant Impact was approved. (Image: Bethesda Mission)

For more information, go to:

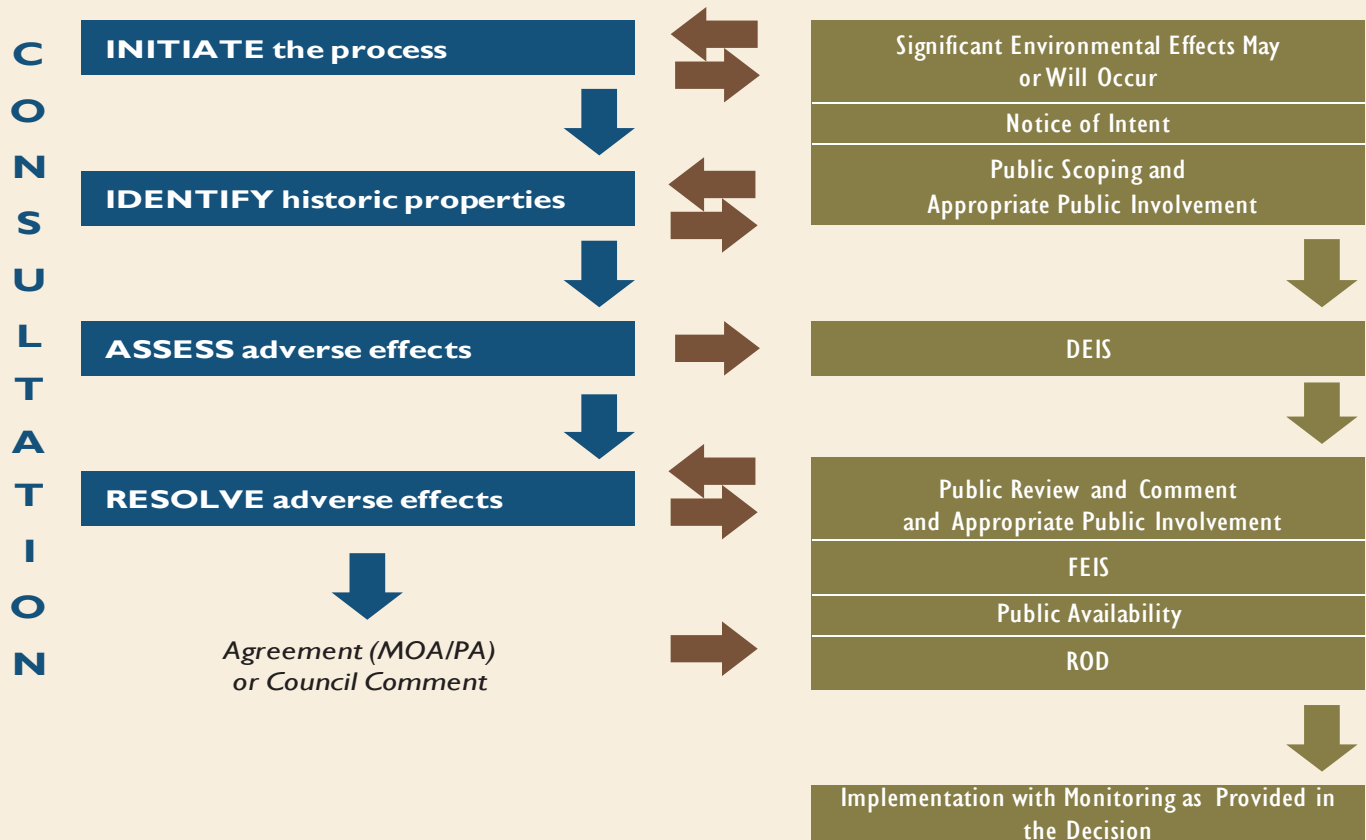
<http://harrisburgcourthouse.com/>

The determination of whether an undertaking...requires preparation of an EIS under NEPA, should include consideration of the undertaking's likely effects on historic properties.

A finding of adverse effect on a historic property does not necessarily require an EIS under NEPA.

36 C.F.R. § 800.8(a)(1)

TIMING AND COMMUNICATION SECTION 106 AND EIS



Note these graphics present generic depictions of the two review processes.

C. Environmental Impact Statements

When an agency determines at the outset of the review process or through preparation of an EA that a proposed action is a major Federal action that may significantly affect the quality of the human environment, it prepares an EIS. When an EIS is prepared, the NEPA review process is concluded when a ROD is issued.⁴⁵ When coordinating preparation of an EIS with the Section 106 process, agencies are encouraged to incorporate and build upon the discussion and recommendations for EAs as outlined above.

1. Preliminary Analysis

The Federal agency should begin coordinating the EIS and Section 106 processes when developing the statement of Purpose and Need and identifying interested parties including potential cooperating agencies and consulting parties. This early effort will facilitate the development of a comprehensive schedule and tracking system that

incorporates EIS, Section 106, as well as other environmental review requirements and milestones. The agency should also include tribal consultation requirements under EO 13175 and related authorities into a comprehensive communication plan to ensure the public, tribes, and consulting parties receive clear and complete information on when and how to provide their input. This will enable these parties to engage the agency in a manner that makes the best use of their time and expertise.

2. Scoping

The agency should include language in the Notice of Intent (NOI) and any notices of scoping, stating the agency's intent to discuss Section 106 and utilize scoping to partially fulfill the Section 106 public notification and consultation requirements. Scoping may be an opportunity to identify consulting parties and initiate consultation. Agencies should ensure all public communications and scoping meetings include Section

106 information. The agency should clearly describe the form and format of public meetings, hearings, or listening sessions,⁴⁶ and clarify that Section 106 will be coordinated with the EIS process; including how and when that coordination will take place. The agency should present this information in plain language so that diverse members of the public and potential consulting parties can understand what will be discussed. In addition, the public should be given enough information so that it can determine whether, or how, comments might be provided and considered by the agency.

When an EIS is being prepared, agencies consider alternatives that address the purpose and need for the action⁴⁷ and the affected environment, meaning the environment of the area to be potentially affected or created by the alternatives under consideration.⁴⁸ As stated earlier, the “cultural resources” that are to be identified and assessed as part of the affected environment include a broader array of properties than the “historic properties” defined in Section 106. For example, the identification of cultural resources when preparing an EIS might include resources such as cultural institutions, resources that embody cultural practices, and sacred sites that do not otherwise meet the definition of a historic property.

By initiating consultation with the SHPO, THPO, tribes, Native Hawaiian organizations, and other consulting parties early in the process, the agency can begin to identify historic properties and effects to historic properties before the early drafting stages of the cultural resources section of the EIS. An agency may plan the timing of Section 106 consultation and the extent and timing of sharing EIS related information with consulting parties, to maximize the opportunity for Section 106 consultation to assist in describing the affected environment and in the development of alternatives for the EIS. Consulting parties can contribute information that is relevant and timely to both procedures. Consulting parties can provide the agency with new information, suggestions, and creative options that might help it to better understand the impacts associated with its potential and proposed alternatives or in developing new alternatives. Agencies should be aware that initial

alternatives might need to be reevaluated, revised, or modified as additional information about historic properties and potential effects come to light. The administrative record should document all relevant discussions and reviews.

3. Preparing the EIS

An EIS includes the analysis of the environmental impacts of each reasonable alternative. The relative scope of this analysis depends upon the level of probable effects and the complexity of the proposed alternative, and should be informed by consultation with the SHPO/THPO, affected Indian tribes, and Native Hawaiian organizations under Section 106, particularly with regard to the potential for large scale properties of religious or cultural significance. The agency should include any information obtained from the Section 106 consultation in the draft EIS sections on affected environment and impacts, subject to the confidentiality provisions of Section 304 of the NHPA. This ensures that determinations regarding which alternatives to advance for detailed analysis and which alternative is selected as the preferred alternative are made with an appropriate awareness of historic preservation concerns.

In addition to consultation, the EIS and Section 106 processes typically require specialized studies, including historic resource surveys, to fill data gaps. The EIS may need to include such studies for all alternatives, and Section 106 may require more detailed studies, particularly in the area of potential effects, for the preferred alternative. Agencies will want to establish the timing and specifications for specialized studies so that sufficient information is available to meet the requirements for both the EIS and Section 106 at each step in the compliance process, particularly with regard to the alternative that may likely be selected. Early consideration and coordination of the EIS and Section 106 processes will help achieve this, avoid duplication of effort, and lessen the risk that issues raised late in the process will require development of additional alternatives specifically to address historic property concerns.

4. Public Comment

By including Section 106 information in the Notices of Availability (NOA) and other public notices, agencies may meet the Section 106 requirements for public notification together with the EIS public review and comment requirements. The draft EIS or preliminary draft EIS can also be used to facilitate consultation efforts, including the development of draft MOAs and PAs. Public comments received by the agency should be considered in the identification of historic properties, the assessment of effects, and in the resolution of adverse effects.

5. Record of Decision

When there is a need to resolve adverse effects to historic properties, the agency develops mitigation measures that are typically memorialized in the signed MOA or PA. These documents should be included in the final EIS or ROD. Agencies and applicants should ensure there is an adequate mechanism for monitoring compliance with those measures, and that any commitments made in the final EIS and MOA or PA are supported by the appropriate authority, resources, and funding.

Opportunities for Coordination:

- ▶ Include language in any notification of scoping (including NOI) stating how it meets Section 106 public notification requirements.
- ▶ Ensure all public communications and scoping meetings include relevant Section 106 information.
- ▶ Use scoping and Section 106 consultation to identify historic resources and key issues, especially landscape level concerns.
- ▶ Develop an integrated strategy for completing studies to fill data gaps that meet information standards and timing requirements for both the EIS and Section 106 processes.
- ▶ Include information obtained from the Section 106 consultation in the draft EIS or preliminary draft EIS sections on affected environment, impacts, and potential mitigation for public review and comment to help meet Section 106 documentation requirements (remember to keep in mind confidentiality concerns).
- ▶ Include any draft MOA and PA in the Appendices of the Draft EIS. Include the draft final or final MOA or PA in an Appendix to the final EIS.
- ▶ Update the public on the status of the EIS and Section 106 reviews on agency Web sites, if available.
- ▶ Keep tribes and Native Hawaiian organizations informed by including project information and the proposed schedule at all regular meetings.
- ▶ Review comments received through the EIS process to identify any unresolved cultural, historic, and/or tribal issues.
- ▶ Where appropriate to resolve adverse effects, describe the mitigation commitments in the decision record.

V. ROAD MAP FOR SUBSTITUTION

A. Choosing Substitution

Substitution under 36 C.F.R. § 800.8(c) permits agencies to use the NEPA review to comply with Section 106 as an alternative to the process set out in 36 C.F.R. §§ 800.3-800.6. The use of a substitution approach allows agencies to use the procedures and documentation required for the preparation of an EA/FONSI or EIS/ROD to comply with the Section 106 procedures. To do so, the agency must notify the ACHP and SHPO/THPO in advance that it intends to do so and meet certain specified standards and documentation requirements as set forth in 36 C.F.R. § 800.8(c)(1). Substitution is appropriate for a proposed action for which an EA or EIS will be prepared, but not for a categorically excluded action. Those projects using a CE must follow the normal Section 106 procedures at 36 C.F.R. §§ 800.3-800.6 or an applicable program alternative.⁴⁹

There are instances where the substitution approach might not work as well as the coordinated approach. For instance, where a project involves multiple, complicated impacts on many different types of resources, but Section 106 issues appear to be minor and straightforward, it may be more efficient to fulfill the requirements of Section 106 in a concurrent but parallel manner to avoid complicating a single review process. In addition, where a high level of public controversy or complex procedural issues have emerged over the potential impacts to historic properties, an agency might recognize the benefit of keeping the review processes separate so that attention can be focused on managing and resolving discrete controversies. The decision to substitute NEPA for Section 106 purposes may also be influenced by factors stemming from an agency's compliance with other environmental laws, such as the ESA and the Clean Water Act. The ACHP, CEQ, and other agency decision makers, as appropriate, can assist with the decision to use substitution. Prior agency experience with similar actions or projects within the same geographic area can also help to guide the decision.



The National Park Service (NPS) proposed a General Management Plan (GMP) that will provide a comprehensive direction for resource preservation and visitor use, direction for management of the Site, and a basic foundation for decision making for Abraham Lincoln Home National Historic Site for the next 15 to 20 years. The selected alternative focuses on providing visitors the opportunity to experience the historic Lincoln neighborhood as Lincoln knew it during his residence in Springfield, Illinois. This goal would be accomplished in part through rehabilitation and restoration of historic buildings and new construction within the National Historic Site. The implementation of all projects and programs stemming from the GMP is contingent upon congressional funding.

The NPS used the NEPA process to fulfill its Section 106 responsibilities in accordance with 36 C.F.R. § 800.8(c). Through Section 106 consultation, the NPS found that the GMP, as a plan without appropriated funding to implement the projects, would not affect historic properties. Consulting parties, however, anticipate the infrastructure projects stemming from the GMP to have the potential to adversely affect historic properties. Accordingly, NPS committed in its Record of Decision to meet the requirements of Section 106 when planning any of the individual projects or programs that might stem from the GMP. (Image: NPS)

To learn more about the General Management Plan and review the combined NEPA/106 documentation, go to:

<http://parkplanning.nps.gov/projectHome.cfm?projectID=13436>



The Federal Transit Administration (FTA) proposed a grant to the Regional Transportation District (RTD) of Denver, Colorado, for the construction of the Gold Line, an 11.2-mile electric commuter rail transit line. FTA notified the ACHP and the Colorado State Historic Preservation Office (SHPO) of its intent to use the NEPA process for Section 106 purposes in accordance with 36 C.F.R. § 800.8(c). Through Section 106 consultation, the FTA found that the preferred alternative would adversely affect several historic properties. FTA also found it was necessary to phase the identification, evaluation, and assessment of effects to archaeological sites on properties inaccessible prior to the approval of the grant. FTA documented its commitment to phased identification and mitigation measures in a Section 106 Memorandum of Agreement (MOA). The Record of Decision was approved in 2009, and the project is currently under construction. (Image: RTD)

For more information, go to:

http://www.rtd-fastracks.com/gl_3

An agency official may use the process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 in lieu of the procedures in §§ 800.3—800.6 if the agency official has notified in advance the SHPO/THPO and the ACHP that it intends to do so and the...standards are met [as provided in 36 C.F.R. §800.8(c)(1)].
36 C.F.R. § 800.8(c)

Early in the project planning stage, an agency should consider the following questions when determining whether substitution under 36 C.F.R. § 800.8(c) is appropriate:

- ▶ Will the Federal agency be actively involved in the development of the NEPA document (as opposed to an applicant, project sponsor, or contractor) and therefore be able to ensure its consultation responsibilities are being met?
- ▶ Are the agency delegations of authority and staff and other resources well positioned to support the substitution process?
- ▶ Will a single participation process enhance public engagement?
- ▶ Will substitution enhance the opportunity to resolve adverse effects because resource conflicts are related, or will it complicate other analyses?

Agencies will generally be able to answer “yes” to the majority of these questions for projects that make good candidates to the substitution approach.

The substitution approach requires advance planning to ensure that the NEPA review will meet the standards set forth in 36 C.F.R. § 800.8(c)(1). The substitution approach can clearly save time and documentation where an agency’s undertaking would have adverse effects on multiple historic properties and cultural resources and the agency is preparing an EIS. The agency may document the final resolution of adverse effects in the ROD and if the ROD is used in this way, then the agency is not required to develop a separate Section 106 agreement document to conclude the Section 106 process.⁵⁰

B. Meeting the Substitution Procedural Requirements and Standards

The substitution process requires that during the preparation of an EA or EIS, agencies must meet certain procedural requirements set out in 36 C.F.R. § 800.8(c) (1), (2), (3), and (4) and the four “standards,” set out in 36 C.F.R. § 800.8(c)(i)-(iv). The requirements and standards of the substitution process and advice on how to meet them during a NEPA review are outlined below. Attachment C to this handbook provides a checklist for

practitioners to use in preparing or reviewing a draft EIS or EA used for Section 106 purposes. This checklist should be particularly helpful for those practitioners working through the substitution approach for the first time.

1. Notification (36 C.F.R. § 800.8(c))

An agency must provide advance notice to the ACHP and SHPO/THPO that it intends to use the process and documentation for preparing an EA/FONSI or EIS/ROD to comply with Section 106 in lieu of 36 C.F.R. § 800.3 through § 800.8. Agencies may prepare a comprehensive project schedule and communication plan at this time to assist with internal coordination and timely completion of all substitution requirements. Roles and responsibilities should be clearly specified. This is also a good opportunity to ensure that agency decision making authority and staff and other resources are aligned to support successful execution of the plan.

2. Identifying Consulting Parties (36 C.F.R. § 800.8(c)(1)(i))

Section 106 is predicated on the active involvement of consulting parties. Agencies must keep them informed and engaged. An agency intending to use 36 C.F.R. § 800.8(c) must identify consulting parties (standard 36 C.F.R. § 800.8(c)(1)(i)) during NEPA scoping consistent with the comprehensive project schedule and communication plan. Identifying and engaging diverse consulting parties (as defined in 36 C.F.R. § 800.2(c)) at this time is vital to explain the structure and context of the substitution process and to avoid potential confusion about the forthcoming NEPA process and documentation. Stakeholders may be unfamiliar with the substitution process, and agencies should explain the opportunities for enhancing stakeholder participation, as well as the efficiencies for the agency, and be prepared to respond to questions. The agency must ensure all consulting parties are included in any notification and distribution lists for NEPA documents, and that the ACHP is included in the notification and distribution when the agency is preparing a draft EIS and EIS.⁵¹

3. Identifying Historic Properties (36 C.F.R. § 800.8(c)(1)(ii)) &

Involving the Public (36 C.F.R. § 800.8(c)(1)(iv))

As an agency develops its alternatives for an EA or EIS, it must determine its area of potential effects and make a reasonable and good faith effort to identify historic properties in the area of potential effects.⁵² This effort must include consultation with consulting parties. Agencies may phase the scope and timing of their identification efforts to synchronize with their consideration of alternatives in the NEPA process, provided consideration of historic properties is commensurate with the assessment of other environmental factors. Where large land areas or large corridors are involved, final identification and evaluation of properties may be deferred through execution of a PA or in the ROD. When an agency defers completion of final identification of historic properties, it should establish the likely presence of historic properties for each alternative through background research, consultation, and the appropriate level of field identification, taking into account the number of alternatives, the magnitude of the undertaking and its likely effects, and the views of the SHPO/THPO and any other consulting party.⁵³

The results of the agency's identification and evaluation efforts must be clearly identified in the NEPA documents so that agencies may effectively use draft NEPA documents as a way to share information with the public⁵⁴ and consulting parties during public comment periods. If draft documents are not normally made available for public review and comment (such as preliminary draft EISs or draft EAs), agencies will need to consider how they will provide that information to the public and consulting parties. Providing the public the opportunity to review NEPA documents without an opportunity to provide comments will typically not be sufficient to satisfy Section 106 public involvement requirements.

4. Consulting on Effects

(36 C.F.R. § 800.8(c)(1)(iii))

The NEPA documentation must clearly state the agency's determination of effect, and this information must be provided to the SHPO/THPO and other consulting parties for their review and comment. To focus and help expedite the consulting party's review, the agency can send a draft or final NEPA document to the consulting parties and inform them where the relevant Section 106 information is located and how the NEPA document does or will address Section 106 findings and determinations. Where the Section 106 process can be concluded with a finding that no historic properties are affected or that there are no adverse effects, the agency must clearly state that finding in the final NEPA document (EA or EIS).

5. Resolving Adverse Effects

(36 C.F.R. § 800.8(c)(1)(v))

Where the assessment of effects finds that there are potential adverse effects to historic properties, the agency consults to develop alternatives and proposed measures that might avoid, minimize, or mitigate those adverse effects. Substitution does not relieve an agency of its Section 106 responsibility to resolve adverse effects to historic properties through consultation. Alternatives and proposed measures that are developed through that consultation must be described in the EA, draft EIS (DEIS), or EIS. The description in the NEPA document should not be the first time the consulting parties see the measures proposed for resolving adverse effects.

6. Providing Opportunity for Review and Objection (36 C.F.R. §§ 800.8(c)(2-3))

Agencies must submit the EA, DEIS, or EIS to the SHPO/THPO and other consulting parties for review. A DEIS or final EIS must also go to the ACHP for review.⁵⁵ During or prior to the time allowed for public review and comment during the EA or EIS process or the review required by Section 800.8(c)(2)(i) (if these do not coincide), a consulting party may report an objection to the agency that the process has not met the standards of Section 800.8(c)(1) or that the resolution of adverse effects is inadequate.⁵⁶ Consequently, the comprehensive project schedule must include sufficient time for the

opportunity for review and the possibility of an objection. Agencies planning to publish a Record of Decision 30 days after the publication of the final EIS should note that the opportunity for review and objection must occur prior to publication of the final EIS.

If there is an objection, the agency shall refer the objection to the ACHP for its opinion, which the ACHP has 30 days to provide.⁵⁷ If the ACHP does not agree with the objection or does not respond within 30 days, the agency may proceed to conclude its NEPA and Section 106 reviews. When the ACHP agrees with the objection, the agency takes the ACHP opinion into account in reaching a final decision regarding the issue following the process set out at 36 C.F.R. § 800.8(c)(3)(i).

7. Terminating the Substitution Process

If, as the result of an objection under 36 C.F.R. § 800.8(c)(2)(ii) or during consultation to resolve adverse effects, disagreement reaches a point where the substitution process is no longer prudent, then agencies may return to the appropriate step in the standard Section 106 process with notification to consulting parties. This notification must be in writing and state how previous steps met the standard procedural requirements and how the agency intends to meet the remaining Section 106 procedural requirements. If such a situation arises, the agency should consider meeting with all consulting parties to explain the specifics of complying with Section 106 and how it will continue to engage consulting parties. It is also helpful for the agency to develop a comprehensive project schedule to avoid unnecessary delays. The agency can still make use of opportunities to coordinate the remaining steps in the Section 106 process with the remaining NEPA review process, as outlined earlier in this handbook.

8. Concluding the Substitution Process

(36 C.F.R. § 800.8(c)(4))

Following review of the EA, DEIS, or EIS and resolution of any objections under 36 C.F.R. § 800.8(c)(3) and before approving the undertaking, the agency must conclude the Section 106 substitution process. If, during preparation of the EA or EIS, an agency found there were no adverse effects to historic properties from the

proposed undertaking, it documents this in the EA or EIS.

When the agency is preparing an EA and there are adverse effects to historic properties, then the agency will have to develop an MOA (or a PA under 36 C.F.R. § 800.14(b)) or consider formal ACHP comments to conclude the Section 106 process before making the decision whether to proceed with the proposed action. A FONSI should make it clear that adverse effects have been resolved and an MOA, PA, or formal ACHP comment process was concluded. Use of a mitigated FONSI does not replace the requirement and procedures in the regulations implementing Section 106 to conclude the process with an MOA, PA, or ACHP comment.

If during preparation of an EIS, an agency finds there would be adverse effects from the proposed undertaking, it must document the resolution of those effects in one of the following ways: (1) incorporating a description of the agency's binding commitment to measures to avoid, minimize, or mitigate such effects in the ROD, if such measures were proposed in the DEIS or EIS and available for the consulting parties' review and opportunity to object; (2) executing an MOA in compliance with 36 C.F.R. § 800.6(c); or (3) receiving ACHP formal comments under 36 C.F.R. § 800.7 and responding to them. When an agency makes a binding commitment to mitigation measures in the ROD, the ROD should be specific regarding who will do what. The ROD should also include such administrative provisions as a process for any continued consultation during implementation, timelines for implementation, procedures for post-review discoveries, a dispute resolution process, and a provision addressing future changes to the undertaking as described in 36 C.F.R. § 800.8(c)(5).

A final point to consider is whether the proposed action is a program or complex action occurring in stages. For example, when a programmatic EA or EIS is being completed and there will be subsequent project specific NEPA documents, a PA may be used to conclude the Section 106 process for the programmatic EA or EIS. A PA will document the agreement of signatories on a process for ongoing or future Section 106 responsibilities.

In instances where an agency believes that future flexibility may be needed, a PA can include amendment and dispute resolution procedures.

C. Challenges of the Substitution Process

The timing of the decision to pursue a substitution approach is extremely important. This decision must be made very early in the planning process and before either the Section 106 or NEPA review is substantively underway.⁵⁸

At that early stage, agencies should devise a strategy for involving the SHPO, THPO, and consulting parties and for meeting the requirements of 36 C.F.R. § 800.8(c)(1)-(2). A good working relationship with the relevant SHPO or THPO will help the substitution approach move forward more smoothly. Consider any agency-specific policies or practices that might complicate the process, such as delegation to local governments or applicants to act in the Federal agency's stead. In addition, take into consideration those responsibilities, including government-to-government consultation with Indian tribes that cannot be delegated. Finally, consider whether the SHPO is involved in a state environmental review, in which case the scope of their state role and authority needs to be taken into consideration. This could include a state environmental review with overlapping requirements that have distinct provisions.

VI. EMERGENCY PROCEDURES

The NEPA and Section 106 regulations both include provisions for emergency situations, which would include natural disasters and security threats. Under NEPA, agencies must consult with CEQ to receive alternative arrangements for actions with potentially significant environmental impacts that must be taken in a time frame that does not allow for the normal EIS process.⁵⁹ Under Section 106, when an emergency represents an immediate threat to life or property, or is officially declared by the President, a tribal government, or a state governor, an agency may expedite consultation through notification to the ACHP and SHPO/THPO and provide an abbreviated opportunity to comment, instead of following the standard process in 36 C.F.R. §§ 800.3-800.6. This provision only applies to undertakings that will be implemented within 30 days after the emergency declaration.

The National Disaster Recovery Framework⁶⁰ provides a structure for disaster recovery efforts that encourages coordination among state and Federal agencies, nongovernmental partners, and other stakeholders. Agencies are encouraged to use the NEPA and Section 106 coordination and substitution advice provided in this handbook to expedite their support to communities for recovery actions.

In addition, agencies are encouraged by the ACHP to collaborate with consulting parties in advance of a disaster to develop procedures that respond to the effects of disasters on historic properties and are responsive to agency programs. Once these procedures are approved by the ACHP, such procedures will govern the agency's compliance with Section 106.⁶¹

TIP:

Over the years, FEMA has developed template language that it proposes to consulting parties when drafting a Statewide PA. A Statewide PA is an umbrella agreement that sets forth compliance procedures for pre- and post-disaster recovery programs authorized by FEMA. This template language is meant to provide FEMA a consistent approach for their Statewide PAs to help expedite the Section 106 process for their assistance and grant programs. Statewide PAs can help states prepare for emergency situations and improve coordination when emergencies occur. FEMA may include in a Statewide PA provisions that authorize other agencies to operate under its terms. They may also allow FEMA to comply with its own Section 106 responsibilities with regard to an undertaking by adopting the findings of another agency that has already completed its Section 106 review of the same undertaking.

VII. TIMING OF DECISIONS AND CONTINUING COLLABORATION

The goal of the Section 106 process is for agencies to identify historic properties potentially affected by a proposed undertaking, assess the effects of the undertaking, and seek ways to avoid, minimize, or mitigate any adverse effects. The initiation of Section 106 should occur early in project planning and in advance of an agency making binding decisions regarding the location, design, and siting of a project. By statute, the Section 106 requirements must be met prior to an agency approving the expenditure of funds on an undertaking (other than funds for non-destructive planning) or prior to issuance of a license, permit, or approval needed by the undertaking. Further, an agency must complete the NEPA and Section 106 reviews before signing a decision document.

The NEPA review may conclude with a CE, a FONSI, or a ROD. Under CEQ regulations, CEs, EAs, FONSIs, and EISs are not decision documents. Agencies should avoid issuing NEPA documents that present a final agency decision before they have completed their Section 106 process because the Section 106 process may result in a finding that requires the NEPA document to be revised or supplemented.

If the undertaking is modified after approval of the FONSI or the ROD in a manner that changes the undertaking or alters its effects on historic properties, or if the agency official fails to ensure that the measures to avoid, minimize, or mitigate adverse effects (as specified in either the FONSI or the ROD, or in the binding commitment in the MOA) are carried out, then the agency must notify the ACHP and all consulting parties that supplemental NEPA documentation will be completed or that the agency will revert to the standard Section 106 process by completing the procedures in 36 C.F.R. §§ 800.3-800.6, as necessary.⁶² The supplemental process must be coordinated with consulting parties and meet the same requirements under 36 C.F.R. § 800.8(c) as the original NEPA documentation in those cases where

the agency is continuing the substitution approach and not reverting to the standard Section 106 process.

Although CEQ's regulations allow an agency to adopt another agency's EA or EIS to fulfill its NEPA requirements,⁶³ such an adoption on its own may not fulfill the adopting agency's Section 106 responsibilities unless specifically written into a Section 106 compliance agreement. Such a stipulation in an MOA or PA should be explicit regarding how another Federal agency may join the process and sign the agreement at a later date should its role in the program or undertaking be defined after the agreement has been executed. In the event that such a stipulation is not included in an MOA or PA, an agency should consult with the appropriate SHPO/THPO, ACHP, and other consulting parties to determine the necessity and extent of any further Section 106 review.

When mitigation is used to resolve adverse effects, agencies should incorporate the monitoring of Section 106 mitigation measures with mitigation monitoring under NEPA, ESA, or other environmental review laws and track them concurrently. In 2011, CEQ issued guidance about the importance of monitoring mitigation measures that agencies commit to making when they finalize their NEPA documents and issue their decision, both for ensuring that the mitigation commitments are implemented and for assessing their efficacy in mitigating the action's impacts to the environment.⁶⁴ Consistent with the basic NEPA tenets of public participation, as well as recent executive directives on openness and transparency in government, the guidance encourages agencies to make information about mitigation monitoring available to the public. Similarly, agencies resolving adverse effects to historic properties under 36 C.F.R. § 800.8(c), particularly when formalizing the mitigation through a ROD rather than MOA or PA, should ensure that the monitoring and reporting on the status of agreed-upon mitigation is available to consulting parties and the general public as the action proceeds. An example of how the agency can meet this obligation is to post regular status reports on the implementation of the project's mitigation measures on its Web site.

VIII. LESSONS LEARNED AND BEST PRACTICES

Finally, whether using coordination or substitution, it is important to keep track of any lessons learned to share within the agency or with other agencies to assist in making the process more efficient and manageable in the future. Best management practices should also be shared with CEQ and the ACHP and made available on agency Web sites. If agencies that have mastered the use of substitution share their successes, then other agencies may be more amenable to applying this process to their actions and take the opportunity to garner similar benefits. By sharing information, CEQ and the ACHP can also determine the type of training that will be most helpful to diverse practitioners and stakeholders. Sharing information also enables CEQ and the ACHP to stay abreast of trends that inform our policies and procedures.

IX. CONCLUSION

This handbook is intended to help NEPA and Section 106 practitioners administer or participate in NEPA and Section 106 processes in an effective and efficient manner in the 21st century. Going forward, the NEPA and Section 106 review processes should never be considered in isolation or as sequential environmental reviews that never intersect and operate under different schedules and requirements. The current paradigm for environmental reviews advanced by CEQ and the ACHP envision these reviews occurring simultaneously, continually exchanging information, and allowing determinations and recommendations in one to inform the other. Coordination or substitution not only improves the efficiency of the review procedures, but ultimately allows for the fullest consideration of effects to historic properties. Rather than allowing the lag in initiating Section 106 reviews to result in delays in NEPA review, the Section 106 process should be integrated with the NEPA review process—either through coordination or substitution.

The ultimate goal for both NEPA environmental reviews and Section 106 is to ensure the Federal Government considers the effects of its actions upon the environment, acts in the public interest, works efficiently, and makes decisions in an open, efficient, and transparent manner. Integrating the NEPA and Section 106 review processes fulfills the goals set forth in NEPA and the CEQ regulations, and by the ACHP in its Section 106 regulations. These significant environmental reviews have been in existence for almost five decades and are still relevant. By applying this handbook to future reviews, environmental and historic review processes will be synchronized to improve the overall decision making for proposed projects.

X. ENDNOTES

1. 40 C.F.R. § 1501.2.
2. “Modernizing NEPA Implementation,” Section 7.2.1, *available at* <http://ceq.hss.doe.gov/ntf/report/index.html>.
3. 40 C.F.R. § 1501.2.
4. Memorandum for Heads of Federal Departments and Agencies, Improving the Process for Preparing Efficient and Timely Environmental Reviews under the National Environmental Policy Act, March 6, 2012, *available at* http://ceq.hss.doe.gov/current_developments/docs/Improving_NEPA_Efficiencies_06Mar2012.pdf.
5. 36 C.F.R. § 800.16(y).
6. See 40 C.F.R. § 1508.27 (defining significantly).
7. 36 C.F.R. § 800.6.
8. 36 C.F.R. § 800.7(c).
9. 16 USC § 470w(5).
10. See 36 C.F.R. § 60.4 (listing the eligibility criteria for the National Register).
11. 36 C.F.R. § 800.16(l)(1).
12. See 40 C.F.R. § 1502.14 (requiring an agency to rigorously explore and objectively evaluate all reasonable alternatives, and to devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits); CEQ NEPA’s Forty Most Asked Questions, Question 5.b., *available at* <http://ceq.hss.doe.gov/nepa/regs/40/40p3.htm>.
13. 36 C.F.R. § 800.16(d).
14. 40 C.F.R. § 1506.6
15. 36 C.F.R. § 800.2(d)(2)
16. 36 C.F.R. § 800.2(d)(1)
17. 36 C.F.R. § 800.2(a)(4)
18. 36 C.F.R. § 800.2(a)(4)
19. 36 C.F.R. § 800.1(a).
20. 36 C.F.R. § 800.16(f)
21. 40 C.F.R. §§ 1501.6, 1508.5; Memorandum for the Heads of Federal Agencies, Cooperating Agencies in Implementing the Procedural Requirements of the National Environmental Policy Act, January 30, 2002, *available at* <http://ceq.hss.doe.gov/nepa/regs/cooperating/cooperatingagenciesmemorandum.html>; Memorandum for the Heads of Federal Agencies, Designation of Non-Federal Agencies to be Cooperating Agencies in Implementing the Procedural Requirements of the National Environmental Policy Act, July 28, 1999, *available at* <http://ceq.hss.doe.gov/nepa/regs/ceqcoop.pdf>.
22. 16 U.S.C. 470a(d). See also Consultation with Native Hawaiian Organizations in the Section 106 Review Process: A Handbook, June 2011, *available at* <http://www.achp.gov/Native%20Hawaiian%20Consultation%20Handbook.pdf>; Consultation with Indians Tribes in the Section 106 Review Process: A Handbook, June 2012, *available at* <http://www.achp.gov/pdfs/consultation-with-indian-tribes-handbook-june-2012.pdf>. See also U.S. Department of Housing and Urban Development, Tribal Directory Assessment Tool (TDAT) v2.0, *available at* <http://egis.hud.gov/tdat/Tribal.aspx>.
23. 40 C.F.R. § 1502.15.
24. 16 U.S.C. 470w-3.
25. 40 C.F.R. § 1505.2
26. 16 U.S.C. 470h-2(l).
27. 36 C.F.R. § 800.7.
28. 36 C.F.R. § 800.7 (c)(4)
29. 16 U.S.C. 470f.
30. 36 C.F.R. § 800.1(c)
31. 36 C.F.R. § 800.2(c)(4).
32. 40 C.F.R. § 1508.4.
33. 36 C.F.R. § 800.8(b).

34. 40 C.F.R. § 1508.27(b)(8).
35. 40 C.F.R. § 1508.9.
36. 36 C.F.R. § 800.3(c), (f); 40 C.F.R. § 1501.7.
37. 36 C.F.R. § 800.5(a)(1).
38. See 40 C.F.R. § 1508.27 (defining significantly).
39. See 36 C.F.R. § 800.11(a) (providing for adequacy of Section 106 documentation).
40. 40 C.F.R. § 1508.20.
41. Memorandum for the Heads of Federal Agencies, Appropriate Use of Mitigation and Monitoring and Appropriate Use of Mitigated Findings of No Significant Impact, January 14, 2011, *available at* http://ceq.hss.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf.
42. See 36 C.F.R. § 800.6(b) (instructing the Federal agency official to consult with the SHPO/THPO and other consulting parties to seek ways to avoid, minimize, or mitigate the adverse effects to historic properties).
43. 36 C.F.R. § 800.8(a)(1).
44. 16 U.S.C. 470h-2(i); 36 C.F.R. § 800.8(a)(1).
45. 40 C.F.R. § 1505.2.
46. 40 C.F.R. § 1501.7; See 40 C.F.R. § 1506.6.
47. 40 C.F.R. § 1502.14.
48. 40 C.F.R. § 1502.15.
49. 36 C.F.R. § 800.8(b).
50. 36 C.F.R. § 800.8(c)(4)(i)(A).
51. 36 C.F.R. § 800.8(c)(2)(i).
52. 36 C.F.R. 800.8(c)(1)(ii).
53. 36 C.F.R. § 800.4(b)(2)
54. 36 C.F.R. 800.8(c)(1)(iv).
55. 36 C.F.R. § 800.8(c)(2)(i).
56. 36 C.F.R. § 800.8(c)(2)(ii).
57. 36 C.F.R. § 800.8(c)(2)(ii), (c)(3).
58. See 36 C.F.R. § 800.8(c) (“an agency official may use the [substitution process] ... if the agency official has notified in advance the SHPO/THPO and the Council that it intends to do so ...”).
59. 40 C.F.R. § 1506.11.
60. National Response Framework, January 2008, *available at* <http://www.fema.gov/pdf/emergency/nrf/nrf-core.pdf>.
61. 36 C.F.R. § 800.12.
62. 36 C.F.R. § 800.8(c)(5).
63. 40 C.F.R. § 1506.3; Memorandum for Heads of Federal Departments and Agencies, Improving the Process for Preparing Efficient and Timely Environmental Reviews under the National Environmental Policy Act, March 6, 2012, *available at* http://ceq.hss.doe.gov/current_developments/docs/Improving_NEPA_Efficiencies_06Mar2012.pdf.
64. Memorandum for Heads of Federal Departments and Agencies, Appropriate Use of Mitigation and Monitoring and Appropriate Use of Mitigated Findings of No Significant Impact, January 14, 2011, *available at* http://ceq.hss.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf.

ATTACHMENT A

DEFINITIONS AND TRANSLATIONS

The Advisory Council on Historic Preservation (ACHP) advises Federal agencies to coordinate compliance with Section 106 of the National Historic Preservation Act (NHPA) and the procedures in the regulations implementing Section 106, “Protection of Historic Properties” (36 C.F.R. Part 800), with steps taken to meet the requirements of the National Environmental Policy Act (NEPA). The ACHP recommends that participants in the Section 106 process and NEPA practitioners familiarize themselves with the vocabulary of the two processes in order to better understand the relationship between the requirements and to realize opportunities to avoid unnecessary duplication of effort. The following is a selection of defined terms with highlighted comparisons and contrasts regarding their use in the NEPA and NHPA contexts.

TERM/PHRASE	NEPA	NHPA
Cultural Resources (NEPA)/ Historic Properties (Section 106)	Effects considered under NEPA include cultural and historic. [40 C.F.R. § 1508.8]	Any prehistoric or historic district, site, building structure, or object included in or eligible for inclusion in the National Register of Historic Places. [36 C.F.R. § 800.16.(l)(1)] Properties of religious and cultural significance to Indian tribes and Native Hawaiian organizations may be determined to be eligible for inclusion in the National Register. [16 U.S.C. 470a(d)(6)(A)]
Federal Action (NEPA)/ Undertaking (Section 106)	Federal actions includes activities entirely or partially financed, assisted, conducted, regulated, or approved by Federal agencies. Federal actions include adopting policies such as, rules or regulations; adopting plans; adopting programs; or approving projects; ongoing activities; issuing permits; or financing projects completed by another entity. [40 C.F.R. § 1508.18]	A project, activities, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license, or approval. [36 C.F.R. § 800.16(y)]
Affected Environment (NEPA)/ Area of Potential Effects (Section 106)	The environment of the area(s) to be affected or created by the alternatives under consideration. [40 C.F.R. § 1502.15]	The geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. [36 C.F.R. § 800.16(d)]
Significance (NEPA)/ Significant (Section 106)	Used to describe the level of impact a proposed action may have. Context and intensity have to be evaluated when assessing significance. Context is described below; intensity refers to the severity of the impact, in whatever context(s) it occurs.	Use to describe the historic resource that has certain character defining features that make it historically significant and therefore eligible for listing in the National Register with the requisite integrity. See National Register of Historic Places eligibility criteria. [40 C.F.R. § 60.4]
Significant Impact (NEPA)/ Adverse effect (Section 106)	See Significance (NEPA) above.	Alteration to the characteristics of a historic property that qualify it for inclusion in the National Register of Historic Places in a manner that would diminish its integrity. [36 C.F.R. § 800.5(a)(1)]

TERM/PHRASE	NEPA	NHPA
Public Involvement (NEPA)/ Consultation (Section 106)	Agencies shall provide notice of NEPA-related public hearings or meetings and the availability of environmental documents. They shall solicit information and comments from the public, and make EISs and their supporting documentation available subject to the Freedom of Information Act. [40 C.F.R. § 1506.6]	The process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them. [36 C.F.R. § 800.16(f)] Agencies are required to consult with certain parties (see below) and give the public an opportunity to comment.
Stakeholders (NEPA)/ Consulting Parties (Section 106)	The term “stakeholder” is used throughout this handbook to refer to potentially impacted entities, including members of the public, who participate in some part of the NEPA process.	Parties that have consultative roles in the Section 106 process, including SHPOs; THPOs; Indian tribes; Native Hawaiian organizations; representatives of local governments; applicants for Federal assistance, permits, licenses, and other approvals; the ACHP; and other individuals and organizations with a demonstrated interest in the undertaking or the affected historic properties. [36 C.F.R. § 800.2(c)]
Cooperating Agency (NEPA)/ Consulting Party (Section 106)	Any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment. A state or local agency of similar qualifications or, when the effects are on a reservation, an Indian tribe, may by agreement with the lead agency become a cooperating agency. [40 C.F.R. § 1508.5]	See Consulting Party (Section 106) above.
Context	“Context” is the geographic biophysical, and social context in which the effects will occur. The CEQ regulations [40 C.F.R. § 1508.27] mention society as a whole, the region, and affected interests as examples of context. Considering contexts does not mean giving greater attention to, for example, effects on society as a whole than to effects on a local area. The importance of a small-scale impact must be considered in the context of the local area and not dismissed because it lacks impacts on larger areas.	“Historic context” or “context” is background information gathered to evaluate the historic significance of a historic property.
Mitigation	Mitigation includes avoiding the impact altogether by not taking a certain action or parts of an action; minimizing impacts by limiting the degree or magnitude of the action and its implementation; rectifying the impact by repairing, rehabilitating, or restoring the affected environment; reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and compensating for the impact by replacing or providing substitute resources or environments. [40 C.F.R. § 1508.20]	A measure to resolve specific adverse effects to identified historic property or properties by offsetting such effects. A nexus is required between the mitigation measure(s) and the adverse effects to historic properties.

TERM/PHRASE	NEPA	NHPA
Type of Effects/ Impacts	Effects and impacts are synonymous terms under NEPA. The magnitude, duration, and timing of the effect to different aspects of the human environment are evaluated in the impact section of an EA or an EIS for their significance. Effects can be beneficial or adverse, and direct, indirect, or cumulative. [40 C.F.R. § 1508.8]	An “effect” means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register of Historic Places. [36 C.F.R. § 800.16(i)] Adverse effects are described above and may include direct, indirect, or cumulative effects.
Cumulative Effects	The impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertaking such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. [40 C.F.R. § 1508.7] An individual action may not have much effect, but it may be part of a pattern of actions whose combined effects on a resource are significant.	Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. [36 C.F.R. § 800.5(a)(1)] While the Section 106 regulations do not define “cumulative effects,” the CEQ regulation definition of “cumulative impact” is analogous and instructive.
Indirect Effects	Reasonably foreseeable impacts that occur later in time or are further removed in distance from the proposed action. [40 C.F.R. § 1508.8] These are often referred to as “downstream” impacts, or future impacts.	Indirect effects may change the character of the property’s use or physical features within the property’s setting that contribute to its historic significance; are often audible, atmospheric, and visual effects; and may relate to viewshed issues.
Direct Effects	An impact that occurs as a result of the proposal or alternative in the same place and at the same time as the action. Direct effects include actual changes to cultural or historic resources. [40 C.F.R. § 1508.8]	A direct effect to a historic property would include demolition of a historic building, major disturbance of an archaeological site, or any other actions that occur to the property itself.

ATTACHMENT B

TEXT OF 36 C.F.R. § 800.8(c)

Use of the NEPA process for Section 106 purposes. An agency official may use the process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with section 106 in lieu of the procedures set forth in §§ 800.3 through 800.6 if the agency official has notified in advance the SHPO/THPO and the Council that it intends to do so and the following standards are met.

(1) *Standards for developing environmental documents to comply with Section 106.* During preparation of the EA or draft EIS (DEIS) the agency official shall:

- (i) Identify consulting parties either pursuant to § 800.3(f) or through the NEPA scoping process with results consistent with § 800.3(f);
- (ii) Identify historic properties and assess the effects of the undertaking on such properties in a manner consistent with the standards and criteria of §§ 800.4 through 800.5, provided that the scope and timing of these steps may be phased to reflect the agency official's consideration of project alternatives in the NEPA process and the effort is commensurate with the assessment of other environmental factors;
- (iii) Consult regarding the effects of the undertaking on historic properties with the SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to affected historic properties, other consulting parties, and the Council, where appropriate, during NEPA scoping, environmental analysis, and the preparation of NEPA documents;
- (iv) Involve the public in accordance with the agency's published NEPA procedures; and
- (v) Develop in consultation with identified consulting parties alternatives and proposed measures that might avoid, minimize or mitigate any adverse effects of the

undertaking on historic properties and describe them in the EA or DEIS.

(2) *Review of environmental documents.*

- (i) The agency official shall submit the EA, DEIS or EIS to the SHPO/THPO, Indian tribes and Native Hawaiian organizations that might attach religious and cultural significance to affected historic properties, and other consulting parties prior to or when making the document available for public comment. If the document being prepared is a DEIS or EIS, the agency official shall also submit it to the Council.
- (ii) Prior to or within the time allowed for public comment on the document, a SHPO/THPO, an Indian tribe or Native Hawaiian organization, another consulting party or the Council may object to the agency official that preparation of the EA, DEIS or EIS has not met the standards set forth in paragraph (c)(1) of this section or that the substantive resolution of the effects on historic properties proposed in an EA, DEIS or EIS is inadequate. If the agency official receives such an objection, the agency official shall refer the matter to the Council.

(3) *Resolution of objections.* Within 30 days of the agency official's referral of an objection under paragraph (c)(2)(ii) of this section, the Council shall review the objection and notify the agency as to its opinion on the objection.

(i) If the Council agrees with the objection:

- (A) The Council shall provide the agency official and, if the Council determines the issue warrants it, the head of the agency with the Council's opinion regarding the objection. A Council decision to provide its opinion to the head of an agency shall be guided by the criteria in appendix A to this part. The person to whom the Council addresses its opinion (the agency official or the

head of the agency) shall take into account the Council's opinion in reaching a final decision on the issue of the objection.

(B) The person to whom the Council addresses its opinion (the agency official or the head of the agency) shall prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the Council's opinion, and provide it to the Council. The head of the agency may delegate his or her duties under this paragraph to the agency's senior Policy Official. If the agency official's initial decision regarding the matter that is the subject of the objection will be revised, the agency official shall proceed in accordance with the revised decision. If the final decision of the agency is to affirm the initial agency decision, once the summary of the final decision has been sent to the Council, the agency official shall continue its compliance with this section.

(ii) If the Council disagrees with the objection, the Council shall so notify the agency official, in which case the agency official shall continue its compliance with this section.

(iii) If the Council fails to respond to the objection within the 30 day period, the agency official shall continue its compliance with this section.

(4) *Approval of the undertaking.* If the agency official has found, during the preparation of an EA or EIS that the effects of an undertaking on historic properties are adverse, the agency official shall develop measures in the EA, DEIS, or EIS to avoid, minimize, or mitigate such effects in accordance with paragraph (c)(1)(v) of this section. The agency official's responsibilities under Section 106 and the procedures in this subpart shall then be satisfied when either:

(i) a binding commitment to such proposed measures is incorporated in

(A) the ROD, if such measures were proposed in a DEIS or EIS; or

(B) an MOA drafted in compliance with § 800.6(c); or

(ii) the Council has commented under § 800.7 and received the agency's response to such comments.

(5) *Modification of the undertaking.* If the undertaking is modified after approval of the FONSI or the ROD in a manner that changes the undertaking or alters its effects on historic properties, or if the agency official fails to ensure that the measures to avoid, minimize or mitigate adverse effects (as specified in either the FONSI or the ROD, or in the binding commitment adopted pursuant to paragraph (c)(4) of this section) are carried out, the agency official shall notify the Council and all consulting parties that supplemental environmental documents will be prepared in compliance with NEPA or that the procedures in §§ 800.3 through 800.6 will be followed as necessary.

ATTACHMENT C

CHECKLIST FOR SUBSTITUTION

This checklist was developed by the Advisory Council on Historic Preservation (ACHP) as a guide for those preparing or reviewing a NEPA document – Environmental Impact Statement (EIS) or Environmental Assessment (EA) – used for Section 106 purposes in accordance with Section 800.8(c) of the Section 106 implementing regulations, “Protection of Historic Properties” (36 C.F.R. Part 800). The checklist is based on the standards for developing environmental documents to comply with Section 106 at 36 C.F.R. § 800.8(c)(1). Ideally, the preparer or reviewer will be able to answer “yes” to all items.

NOTIFICATION	YES	NO	COMMENTS
Did the agency notify <i>in advance</i> the SHPO/THPO and the ACHP of its intent to use the NEPA process for Section 106 purposes?			
Is the notification correspondence included in the EA/DEIS or appendices?			
IDENTIFICATION OF CONSULTING PARTIES	YES	NO	COMMENTS
Is the effort to identify consulting parties described in the EA/DEIS?			
Is a list of the consulting parties provided in the EA/DEIS?			
Are all consulting parties included? (Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties)			
Has the agency reviewed and responded to all requests to be consulting parties? Has the agency documented the exchange in its administrative record?			
IDENTIFICATION OF HISTORIC PROPERTIES	YES	NO	COMMENTS
Is the effort to identify historic properties of all types (buildings, structures, objects, districts, and sites) described, including the Area of Potential Effects and the methodology for investigation?			
If no, has the agency disclosed its intent to phase the identification and assessments?			
Is the effort to identify historic properties commensurate with the assessment of other environmental factors?			
Are determinations of eligibility for the National Register of Historic Places (NRHP) clearly stated?			
Can a layman understand the characteristics of each historic property and why it is significant (eligible for the NRHP) and retains integrity?			

ASSESSMENT OF EFFECTS	YES	NO	COMMENTS
Has one of the following Section 106 effect findings for the undertaking been clearly stated? <ul style="list-style-type: none"> ▶ No historic properties affected ▶ No historic properties adversely affected ▶ Historic properties adversely affected 			
If adverse effects may result, is the application of the criteria of adverse effect described?			
Was all of the above information presented during scoping meetings and/or other public and stakeholder outreach?			
CONSULTATION AND PUBLIC INVOLVEMENT	YES	NO	COMMENTS
Is the SHPO/THPO concurrence with eligibility determinations documented? Is the documentation included in the document and appendices?			
Is the SHPO/THPO concurrence with the Section 106 effect finding documented? Is the correspondence included?			
Has an adequate opportunity for consulting with the SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties been provided prior to the release of the DEIS/EA? Is all relevant documentation (subject to confidentiality) included?			
Do any of the consulting parties substantively disagree with the agency's determinations of eligibility or findings of effect? If so, is the process for seeking agreement on those issues disclosed?			
If a National Historic Landmark (NHL) may be affected by the undertaking, has the agency notified the National Park Service (pursuant to 36 C.F.R. § 800.10(c)) and invited its participation where there may be an adverse effect? Is all relevant correspondence included?			
Does the document cover sheet or distribution letter clearly indicate that the DEIS/EA also documents the Section 106 process?			
Have historic preservation concerns expressed by members of the public been addressed? If appropriate, have such commenters been invited to be consulting parties in the Section 106 review?			
Have the scoping notices and other public meeting notices included information about Section 106?			

DEVELOPMENT OF ALTERNATIVES OR MEASURES TO AVOID, MINIMIZE, OR MITIGATE ADVERSE EFFECTS	YES	NO	COMMENTS
Is the development and evaluation of alternatives or modifications that could avoid or minimize adverse effects to historic properties documented?			
Where appropriate have mitigation measures been proposed?			
Is the consultation with SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, and/or other consulting parties about avoidance, minimization, or mitigation measures documented? Is all relevant documentation (subject to confidentiality) included in the EA/DEIS or appendices?			
STEPS TO CONCLUSION	YES	NO	COMMENTS
<p>Is there a potential for the preferred alternative to adversely affect at least one historic property?</p> <p>If no, Section 106 is complete if no objections are raised by the SHPO/THPO, Indian tribes, Native Hawaiian organizations, local governments, applicants, other consulting parties, or the ACHP.</p> <p>Is the final Section 106 finding documented?</p>			
<p>If the preferred alternative could adversely affect historic properties, is one of the following strategies for completing the Section 106 process identified?</p> <ul style="list-style-type: none"> ▶ Execution of a Memorandum of Agreement or a Programmatic Agreement ▶ Incorporation of the binding commitment to mitigation measures in the Record of Decision ▶ Termination, formal ACHP comments pursuant to 36 C.F.R. § 800.7, and response by head of the agency 			
<p>If incorporating binding commitment to mitigation measures in the ROD, does the ROD include the following:</p> <ul style="list-style-type: none"> ▶ Commitments clearly identifying who will do what by when ▶ Administrative provisions including: <ul style="list-style-type: none"> ▶ Process for continued consultation during implementation (for example, regarding design review, data recovery, development of mitigation products) ▶ Deadlines/timelines for implementation ▶ Post-review discoveries ▶ Dispute resolution process ▶ Contingency for changes to the undertaking referencing 36 C.F.R. § 800.8(c)(5) 			
IMPLEMENTATION	YES	NO	COMMENTS
<p>Is the agency prepared to carry out the commitments made in:</p> <ul style="list-style-type: none"> ▶ Memorandum of Agreement or a Programmatic Agreement, ▶ Record of Decision, or ▶ Response by head of the agency to formal ACHP comments following termination? 			

ATTACHMENT D

LINKS TO MORE INFORMATION

National Historic Preservation Act:

<http://www.achp.gov/docs/nhpa%202008-final.pdf>

National Environmental Policy Act:

http://ceq.hss.doe.gov/laws_and_executive_orders/the_nepa_statute.html

Protection of Historic Properties, 36 C.F.R. Part 800:

<http://www.achp.gov/regs-rev04.pdf>

Regulations for Implementing NEPA, 40 C.F.R. Parts 1500-1508:

http://ceq.hss.doe.gov/ceq_regulations/regulations.html

ACHP's Guidance on Section 106:

<http://www.achp.gov/work106.html>

ACHP's Guidance on Section 106 Program Alternatives:

<http://www.achp.gov/progalt/>

Section 106 Archaeology Guidance:

<http://www.achp.gov/docs/ACHP%20ARCHAEOLOGY%20GUIDANCE.pdf>

ACHP's Office of Native American Affairs:

<http://www.achp.gov/nap.html>

Collaboration in NEPA: A Handbook for Practitioners:

http://ceq.hss.doe.gov/nepa/nepapubs/Collaboration_in_NEPA_Oct2007.pdf

Modernizing NEPA Implementation:

http://ceq.hss.doe.gov/publications/modernizing_nepa_implementation.html

CEQ Guidance on the "Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact:"

http://ceq.hss.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf

CEQ Guidance on Categorical Exclusions:

http://ceq.hss.doe.gov/ceq_regulations/NEPA_CE_Guidance_Nov232010.pdf

FOR MORE INFORMATION
ON THE CEQ, PLEASE VISIT:

ceq.hss.doe.gov

The Council on Environmental Quality coordinates Federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives.

CEQ was established within the Executive Office of the President by Congress as part of the National Environmental Policy Act of 1969, and additional responsibilities were provided by the Environmental Quality Improvement Act of 1970.



Executive Office of the President

COUNCIL ON ENVIRONMENTAL QUALITY

Washington, DC 20503

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FOR MORE INFORMATION
ON THE ACHP, PLEASE VISIT:

www.achp.gov

The Advisory Council on Historic Preservation, an independent Federal agency, promotes the preservation, enhancement, and sustainable use of our nation's diverse historic resources, and advises the President and the Congress on national historic preservation policy.



ADVISORY COUNCIL ON HISTORIC PRESERVATION

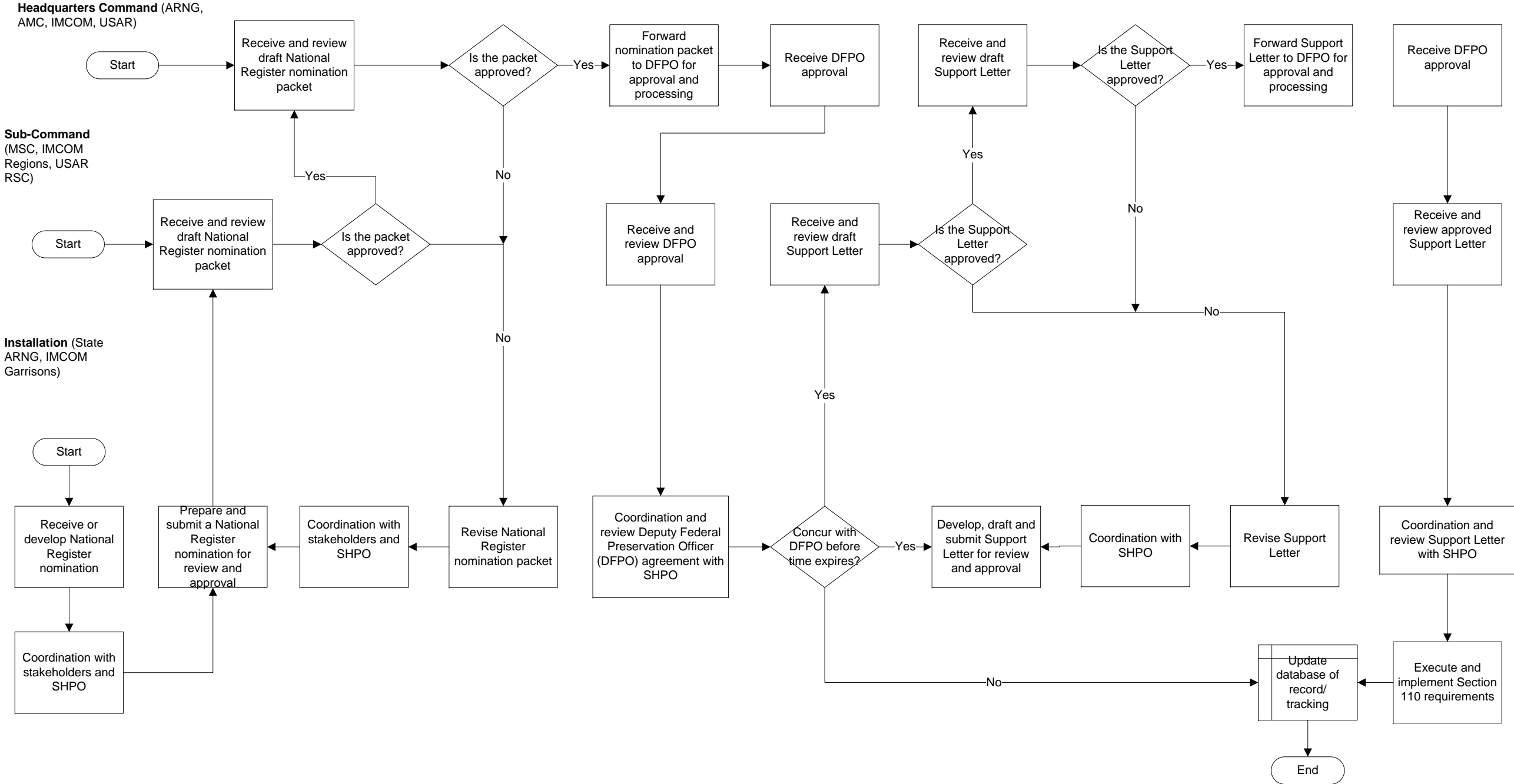
1100 Pennsylvania Avenue NW, Suite 803, Washington, DC 20004

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Cultural Resource Management

National Historic Preservation Act Section 110 Process



APPENDIX K

SAMPLE DOCUMENTS AND TRAINING BRIEF

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Cultural Resources Consolidated Survey

Subsections

CFO Act - Heritage Assets

Collections Curation

Archeology

Archeology on non-Federal Lands

ICRMPs

Inventory of Archeological Resources

Inventory of Historic Buildings and Structures

Native American Cultural Resources

General

The following questions are designed to address the Army's reporting requirements under various Federal laws and regulations. They are primarily divided according to the applicable laws or subject areas. Your answers provide necessary information to HQDA, IMCOM, NGB, and USAR headquarters staff to use in improving the Army cultural resources program and design programmatic compliance actions. Throughout the survey, the term "installation" is used; for the National Guard, this means the state (the "virtual installation"), and for the Reserve, it includes United States Army Reserve Installations and Regional Readiness Commands (RRC) (all RRCs should answer as one RRC, not by individual facility or state).

CFO Act - Heritage Assets

The purpose of this survey is to provide information to assist the Army to meet its financial and historic property reporting requirements under the Chief Financial Officers Act of 1990 and Executive Order 13287 and the annual year end survey for Measures of Merit and the Federal Archeological Report. Every federal agency is required to report data on several categories of "heritage assets" including accurate counts and the condition of the assets. Current accounting standards and financial reporting requirements require Federal agencies to improve the reliability of the data that is used to inform financial statements and to manage the data through a sustainable, integrated data management system to include archeological sites, information reported in the Federal Archeology Report and other reporting requirements. The annual report on heritage assets is forwarded to ASA-FM the first week of October for inclusion in the Army's Annual Financial Statement submitted to DoD.

IMPORTANT NOTE: ALL ANSWERS MUST REFLECT STATUS AS OF THE END OF THE CURRENT FY. SUBMIT ANSWERS ONLY WHEN YOU ARE SURE THERE WILL BE NO CHANGES TO DATA BEFORE 1 OCTOBER 2006. Data should reflect end of FY data for financial reporting purposes. Consequently the data call ends on the last working day of the financial year.

For reporting of this survey in the fall of 2007, the term "current FY" refers to FY 2007. A year later, this term will refer to FY 2008. The CFO Act questions (1-8) should only include properties on Federally-owned land.

1) How many recorded archeological sites (total) are on your installation? For the purposes of this survey, recorded archeological sites are those sites which have been officially identified and given identification numbers (trinomials). Cemeteries are not usually regarded as archeological sites, and are counted separately through the Integrated Facilities System. Please identify the number of all recorded archeological sites on Federally-owned land.

2) How many recorded archeological sites were added to the inventory in the current FY?

3) How many recorded archeological sites were removed from the inventory in the current FY? Please identify (if any) the number of recorded archeological sites that may have been removed from your inventory count. They may have been removed because they were destroyed, mitigated or for other reasons.

4) How many archeological sites have been determined eligible for listing or are listed on the National Register of Historic Places? Eligibility determinations are made in conjunction with the State Historic Preservation Officer, or through an official Determination of Eligibility from the Keeper of the National Register, against the eligibility criteria in NHPA. This number cannot be larger than the number of recorded sites.

5) How many sites were newly determined eligible or listed in the current FY? These sites are those which may or may not have been previously recorded sites but have been newly determined eligible or listed in the current FY and for which a determination of eligibility has been made.

6) How many if any that were previously determined eligible or listed on the NR were determined ineligible or delisted in the current FY? Sites may have been re-evaluated and determined ineligible, destroyed, mitigated or removed for other reasons.

7) Please identify the number of sacred sites that have been recorded on your installation. As defined by EO 13007, a sacred site is a specific delineated location on Federal land that is identified by an Federally-recognized Indian tribe or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion, and that has been identified by the tribe or individual to the Federal agency.

8) Please identify the number of sites of traditional religious or cultural importance to Native Americans or Native Hawaiians (as defined by NHPA) that have been recorded on your installation.

Collections Curation

Pursuant to 36 CFR 79.2, Federal agencies must ensure that archeological collections are deposited in educational and/or scientific institutions, such as museums, universities, or other Federal, state or local governmental agencies that can provide professional curatorial services on a long-term basis, or with the NHOs associated with the artifacts. Curation facilities or repositories established on Army

installations usually do not meet these requirements due to the long-term, permanent recurring costs and personnel requirements required by 36 CFR 79 for such repositories. The only exception to this policy is for Army archeological collections that are accepted for curation in an Army museum that has been certified pursuant to AR 870-20. For Army National Guard, collections include all artifacts recovered from federally-owned or federally funded projects on state, leased or special use permitted land.

9) Is there a Federal Archeological Collection associated with the installation? Installations are responsible for collections and records from Federal Army installations and from certain lands leased or withdrawn from other entities. An archeological collection (per 36 CFR 79) for the purposes of this survey is defined as a whole collection of Federal artifacts (associated with a Federally funded project or federal property) or material remains that are excavated or removed during surveys, excavations or other studies of prehistoric or historic resources, and associated records from all archeological sites on your installation. Not all installations may have a collection, but each installation/state for ARNG with a collection is considered to have only one (1) collection for the whole installation. A collection can be housed in multiple locations.

Yes

No

10) Are all collections at your installation curated in accordance with 36 CFR 79?

Yes

No

11) Identify the completion status of collections curation. Answer "complete" if the collections present have been curated in accordance with the standards set forth in 36 CFR 79. Answer "partially complete" if a collections curation has been initiated, but is not yet complete. Answer "not initiated" if the installation has collections, but has not yet initiated curation IAW 36 CFR 79.

Complete

Partially complete

Not initiated

12) How many cubic feet of archeological collections does the installation own? Any archeological items recovered during archeological projects on your installation are owned by the installation regardless of who has possession. This excludes items repatriated under NAGPRA.

13) How many cubic feet of collections require upgrading to 36 CFR 79 standards?

14) How many linear feet of records associated with stored archeological materials does the installation own? Any archeological items recovered during archeological projects on your installation are owned by the installation regardless of who has possession. This excludes items repatriated under NAGPRA.

15) How many linear feet of records associated with stored archeological materials require upgrading to 36 CFR 79 standards?

16) If you added or removed your Federal Archeological Collection in the current FY, please explain the reason. The answer should clearly explain the circumstance of the addition or deletion, which may include: if you did not report your collections last year or you now have a collection and previously had

none or if for some reason your collection was deaccessioned or somehow does not classify as a Federal Archeological Collection per the definition above but was counted in the previous FY.

Archeology

The Archeological Resources Protection Act (ARPA) applies to archaeological sites over 100 years of age, and concerns criminal and civil penalties for damage or the attempt to damage archaeological sites without a permit. (For the ARNG, questions 17-20 apply to those sites on property listed in PRIDE under Category 1.)

17) Are known archeological sites present on the installation? Enter "yes" if the installation has any archaeological sites over 100 years old. Enter "no" if there are no archeological sites over 100 years old.

Yes

No

18) Are site protection procedures needed on your installation? Site protection measures can include actions such as site stabilization, monitoring programs, fencing, interpretation and physical barriers.

Yes

No

19) If yes, are site protection procedures in effect? If necessary site protection procedures are in effect, answer "yes". If they are necessary but not in effect, answer "no".

Yes

No

20) What is the total number of documented violations of ARPA this FY? Installation law enforcement officials must have formally recorded these violations.

Archeology on non-Federal Lands

For the next two questions, only discuss archeological sites not on Federally-owned land (to include state, leased, special use permitted land and any other land under other PRIDE categories for the ARNG). These numbers should not include the sites reported in the CFO section above.

21) How many sites were discovered on non-Federal lands as a result of Federally-funded or permitted activities during the last fiscal year?

22) How many sites on non-Federal land were determined eligible for the National Register of Historic Places as a result of Federally-funded or permitted activities during the last fiscal year?

Integrated Cultural Resources Management Plan

DoD Instruction 4715.3 and AR 200-1 require installations to develop an Integrated Cultural Resources Management Plan (ICRMP) as an internal compliance and management tool that integrates the entire cultural resources program with on-going mission activities. The ICRMP is based upon information

derived from historic, archeological, ethnographic and architectural investigations. It specifies management strategies for known cultural resources, and methodologies for identification and evaluation of unknown resources. ICRMPs are to be updated every 5 years at a minimum; more frequent updates may be necessary if there are changes to the status of cultural resources and/or administrative activities.

23) Is the installation required to have an Integrated Cultural Resources Management Plan (ICRMP)? Installations with very limited or no cultural resources may request a variance from the requirement. If an installation has requested but not received a variance, they are to answer this question "yes" because the ICRMP is a requirement unless the variance has been received from HQDA. If an installation anticipates requesting a variance, they must answer "yes" to this question until such a request is made and the variance is received. A "no" response is not permitted until a variance has been granted by HQDA IAW AR 200-4, 4-1(d).

Yes

No

24) If a variance was received, in what year was it received?

Not applicable

FY98 or before

FY99

FY00

FY01

FY02

FY03

FY04

FY05

FY06

FY07

25) Is the installation operating under a completed ICRMP? Answer "Yes" if the installation is currently operating under an ICRMP, even if it is due for an update. Answer "No" if the installation is required to have an ICRMP, but has either not initiated the process, or is still completing its first plan

Yes

No

26) When will the ICRMP be finished or next updated? Indicate the FY in which the installation will either a) finish the ICRMP for the first time, or b) update its existing ICRMP within the 5-year cycle.

FY08

FY09

FY10

FY11

FY12

FY13 or beyond

27) The installation have an NHPA Programmatic Agreement (PA) for daily operations?

Yes

No

28) If yes, in what year was the PA signed?

CY 1998 or earlier

CY 1999

CY 2000

CY 2001

CY 2002

CY 2003

CY 2004

CY 2005

CY 2006

CY 2007

29) Does the PA have a sunset clause?

Yes

No

30) In what month does the PA expire?

Jan

Feb

Mar

Apr

May

Jun

Jul

Aug

Sep

Oct

Nov

Dec

31) In what year does the PA expire?

CY 2007

CY 2008

CY 2009

CY 2010

CY 2011

CY 2012

CY 2013

CY 2014

CY 2015

CY 2016

CY 2017

32) Please provide the title and consulting parties of the PA

Inventory of Archeological Resources

Archeological inventories are required for land that could be affected by undertakings under NHPA; an undertaking is defined as a ¿project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.¿ Archeological inventory involves actual field identification of archeological sites, sufficient to judge whether they are eligible for listing in the National Register of Historic Places. An archeological inventory includes examination of areas on the installation with reasonable potential for archeological sites, excluding such areas as impact or safety hazard zones. This includes Federally-owned, state, leased, special use permit, or other special circumstances land where the installation is required to implement NHPA Section 106 review of the impacts a proposed undertaking would have on historic properties. For questions 30-33, consider all lands under the installation jurisdiction (i.e. the entire state for Army National Guard) as one property.

33) Is the installation responsible for the archeological inventory of the land it uses or owns? Answer 'yes' if the installation would have to conduct an archeological survey if that land would be affected by an undertaking, whether or not one is planned for the near term.

Yes

No

34) Identify the completion status of the archeological inventory of that land. Mark 'complete' if all available lands have been inventoried. Mark 'partially complete' if only a portion of the available lands has been inventoried. Mark 'not initiated' if lands have not been inventoried at all, but should be.

Complete

Partially complete

Not initiated

35) How many acres on your installation are accessible for archeological inventory? Lands accessible for inventory are the total acreage of the installation (or state or RRC, as applicable), minus surface danger zones, acreage underwater, or other inaccessible areas.

36) How many acres (total) on your installation have been inventoried for archeological resources?

Inventory of Historic Buildings and Structures

Historic Buildings and Structures Inventory involves actual field identification of historic buildings and structures, sufficient to judge whether they are eligible for listing on the National Register of Historic Places. Buildings over 50 years of age, as well younger buildings that may be eligible for the National Register under the exceptional importance criteria, are included in the inventory. For Army National Guard, this includes all buildings and structures coded within PRIDE that are Federally-owned or able to receive federal funds.

37) Is the installation responsible for the inventory of historic buildings or structures it uses or owns? Answer "yes" if the installation would have to conduct a building survey if those buildings would be affected by an undertaking, whether or not one is planned for the near term.

Yes

No

38) Identify the completion status of all historic building and structure inventories. Mark "complete" if all available buildings and structures over 50 years old have been inventoried. Mark "partially complete" if only a portion of the available buildings and structures over 50 years old has been inventoried. Mark "not initiated" if buildings and structures over 50 years old have not been inventoried at all, but should be

Complete

Partially complete

Not initiated

Native Hawaiian Cultural Resources

Sacred sites are defined as any "specific, discrete, narrowly delineated location, identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion" (EO 13007). Properties of traditional religious or cultural importance to an Indian tribe or Native Hawaiian organization may be determined to be eligible for inclusion on the National Register of Historic Places, as referenced in NHPA Section 101(d)(6).

39) List the NHOs that are associated with the installation.

40) Are access and protection procedures required and in place for Native American sacred sites (as defined in EO 13007) or properties of traditional, cultural or religious importance to NHOs (as defined in NHPA)? For the National Guard and Reserve, this includes sites and properties on both Federal and state land.

Yes

No

41) Does your installation have "cultural items" as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) in collections in Federal possession or control? "Cultural items," as defined by NAGPRA, include human remains, funerary objects, sacred objects and objects of cultural patrimony that have been discovered on Federal lands.

Yes

No

42) If your installation has "cultural items" as defined by NAGPRA in collections, has consultation for repatriation been initiated for those items? Under NAGPRA, Federal agencies must consult with NHOs affiliated with the area in which the cultural items were found, in order to repatriate or otherwise handle the items. If the installation has "cultural items" as defined by NAGPRA, determine if consultation for repatriation has been initiated, and answer "yes" or "no".

Yes

No

Section 6 summaries under NAGPRA are required to have been completed by museums and Federal agencies with possession or control over holdings or collections of Native American unassociated funerary objects, sacred objects, or objects of cultural patrimony. Summaries were to be completed by November 16, 1993 and should have been followed by consultation with tribal government and Native Hawaiian organization leaders and traditional religious leaders.

43) Is your installation required to do a NAGPRA summary per Section 6 of the Act and 43 CFR 10.8?

Yes

No

44) Has your installation completed its NAGPRA summary per Section 6 of the Act and 43 CFR 10.8?

Yes

No

45) Has your installation performed the required consultation for NAGPRA summaries per 43 CFR 10.8(d)?

Yes

No

46) Has your installation completed the notification requirements for NAGPRA summaries per 43 CFR 10.8 (f)?

Yes

No

Section 5 inventories under NAGPRA were to have been completed by November 16, 1995, by museums and Federal agencies which have possession or control over holdings or collections of Native American human remains and associated funerary objects using information possessed by the museum or Federal agency, identifying, to the extent possible, the geographical and cultural affiliation of such items. Inventories should be completed in consultation with tribal government and Native Hawaiian organization officials and traditional religious leaders.

47) Is your installation required to do a NAGPRA inventory per Section 5 of the Act and 43 CFR 10.9?

Yes

No

48) Has your installation completed a NAGPRA inventory per Section 5 of the Act and 43 CFR 10.9?

Yes

No

49) Has your installation performed the required consultation for NAGPRA inventories per 43 CFR 10.9(b)?

Yes

No

50) Has your installation completed all notification requirements per 43 CFR 10.9(e)?

Yes

No

51) If your installation has completed its NAGPRA summary and inventory as required by 43 CFR 10.8 and 10.9, has your installation subsequently received a new holding or collection or located a previously unreported current holding or collection that may include human remains, funerary objects, sacred objects or objects of cultural patrimony as defined by NAGPRA?

Yes

No

NA

General

52) In the past year, has the installation or one or more stakeholders sought the intervention of the Advisory Council on Historic Preservation on a contested historic preservation issue?

Yes

No

53) Please provide any comments on changes in any of the data from previous fiscal year, or other issues, that will assist in HQDA's review of the data.

SAMPLE
MEMORANDUM OF AGREEMENT

AMONG
THE NATIONAL GUARD BUREAU,
XXXX ARMY NATIONAL GUARD

AND
THE XXXXSTATE HISTORIC PRESERVATION OFFICE
FOR THE
XXXXX (Title of the project) PROJECT
(insert year)

WHEREAS, the National Guard Bureau (NGB), as a federal agency, is required to comply with the National Historic Preservation Act (16 U.S.C. §470f) (NHPA), and the NGB provides federal funding and guidance to state Guard organizations; and

WHEREAS, the XXXX Army National Guard (XXARNG) intends (discuss the project) located in (City),(County), (State), using both federal and state funding sources. The buildings were constructed (indicate the construction dates), is owned and operated by the state of XXXX; and

WHEREAS, the XXARNG has evaluated the (building name) as eligible for inclusion in the National Register of Historic Places (NRHP) and received concurrence with this evaluation from the XXXX State Historic Preservation Office (XX SHPO). The buildings are eligible for the NRHP due to (insert reason). and that the XXARNG has determined that the (discuss project) will thus have an adverse effect upon this historic property; and

WHEREAS, the XXARNG has consulted with the XX SHPO pursuant to Section 800.6(b) of (36 CFR Part 800), *Protection of Historic Properties* implementing §106 of the NHPA; and

WHEREAS, the XXARNG has determined that there are no NHOs that attach traditional religious and cultural importance to the structure and landscape within the area of potential effects. (note: If the undertaking will affect such sites, additional WHEREAS clauses and stipulations will need to be included to reflect proper tribal consultation and resolution of adverse effects with tribal involvement); and

WHEREAS, the NGB will follow the stipulations outlined in the Programmatic Memorandum of Agreement among the United States Department of Defense, The Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers dated 07 Jun 86 for the demolition of World War II Temporary Buildings, as amended on 05 May 91; and

WHEREAS, the XXARNG has afforded the public an opportunity to comment on the mitigation plan for the (insert project title) through completion of (indicate type of NEPA documentation ex. REC, EA or EIS) pursuant to the National Environmental Policy Act (40 CFR Part 1500-1508); (note: if a REC is prepared, the installation must make additional efforts at including the public in the process, and should insert language indicating what those efforts were example verbiage -in the case of a REC the XXARNG will invite to comment, by letter, the organizations determined to have an interest in this project) and

WHEREAS the XXARNG in consultation with (insert state name) SHPO, established the area of potential effect (APE) as defined at 36 CFR §800.16(d), identified and evaluated (insert buildings) within the APE as being eligible for the National Register, and determined that the proposed undertaking would

adversely affect such buildings. There are no other properties within the APE considered eligible for the National Register; and

WHEREAS the XXARNG by letter dated (insert date of letter sent to ACHP) invited the Advisory Council on Historic Preservation (ACHP) to participate in this consultation per 36 CFR §800.6 (a) (1) and the ACHP has declined/agreed (select one) to participate in consultation by letter dated (insert date ACHP declined/agreed (select one) to participate); and

(use for demolition projects only) WHEREAS the XXARNG has determined that adaptive reuse or any other alternative to save (insert building name and numbers) is not economically feasible; and

WHEREAS the XXARNG, in consultation with the XX SHPO, has determined that there are no prudent or feasible alternatives for the project scope or location.

NOW, THEREFORE, the XXARNG and the XX SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The XXARNG will ensure that the following measures are implemented:

I. Mitigation of Adverse Effects on (insert title of project)

A. Public Participation. The NEPA process will be used to solicit public participation. The XXARNG shall ensure that the following measures are carried out in order to afford the public an opportunity to participate in the mitigation to be carried out under Stipulation B:

1. The XXARNG will invite, by letter, the (insert organizations names invited to participate) to participate in the project. The XXARNG will, upon request, provide additional information to the public about this project and arrange meetings with individuals or groups to provide more information about the proposed (renovation, demolition, etc.) prior to implementation of this MOA.

B. After consultation with the (insert state) SHPO a determination will be made regarding the appropriate Historic American Building Survey (HABS) level will be performed. (if applicable insert other mitigation measures agreed upon).

1. Recordation Report will include the following:
2. The XXARNG shall ensure that all mitigation listed in (1) above is completed and submitted to the XX SHPO and the (insert the name of the concurring party as applicable) prior to the (insert project type ex. demolition, renovation, etc) of the (insert buildings types). Creation of (insert mitigation agreed upon).

- a. Preparation of a historic context for the (insert the buildings names) and the history of the XXARNG in (insert site location), to be based on information obtained from existing literary and archival sources.
 - b. (Insert mitigation agreed upon - ex. display, etc)
 - c. The XXARNG shall ensure that the (list mitigation) are completed prior to the (insert type of activity ex. demolition, renovation, etc) of the (insert type of buildings).
-
- C. Design Review of Plans for (insert building type). The XXARNG also will provide both the XX SHPO and the (insert consulting party as applicable) with the opportunity to review the designs for the new (insert building type) prior to those designs being put out for contractor bids. This design information is to be treated as confidential; disclosure, distribution, or sharing of the design information, in whole or in part, to any party that is not a signatory to this MOA, is strictly prohibited.

II. Administrative Stipulations

- A. Definition of signatories. For the purposes of this MOA the term "signatories to this MOA" means the NGB, XXARNG and the XX SHPO, each of which has authority under 36 CFR 800.6(c)(8) to terminate the MOA if agreement cannot be reached regarding an amendment.
- B. Professional supervision. The XXARNG shall ensure that all activities regarding research and reporting are carried out pursuant to this MOA are carried out by or under the direct supervision of a person or persons meeting at a minimum the *Secretary of the Interior's Professional Qualifications Standards for Architectural History* (36 CFR Part 61).
- C. Alterations to project documents. The XXARNG shall not alter any plan, scope of services, or other document that has been reviewed and commented on pursuant to this MOA, except to finalize documents commented on in draft, without first affording the signatories to this MOA the opportunity to review the proposed change and determine whether it shall require that this MOA be amended. If one or more such party (ies) determines that an amendment is needed, the signatories to this MOA shall consult in accordance with 36 CFR 800.6(c) (7) to consider such an amendment. The signatories will have thirty days to consider the amendment. The XXARNG will notify in writing everyone when the consultation with the signatories has been completed and the outcome of the consultation
- D. Anti-Deficiency Act compliance. All requirements set forth in this MOA requiring expenditure of Army funds are expressly subject to the availability of appropriations and the requirements of the Anti-Deficiency Act (31 U.S.C. Section 1341). No obligation undertaken by the Army under the terms of this MOA shall require or be interpreted to require a commitment to expend funds not appropriated for a particular purpose.
- E. Dispute Resolution.
 - 1. Should the XX SHPO object in writing to any actions carried out or proposed pursuant to this MOA, the XXARNG will consult with the XX SHPO to resolve the objection. If the XXARNG determines that the objection cannot be resolved, the XXARNG will request further comments from the ACHP pursuant to 36 CFR § 800.7. If after initiating such consultation the XXARNG determines that the objection cannot be resolved through consultation, the XXARNG shall forward all documentation relevant to the objection to the ACHP, including

the XXARNG's proposed response to the objection. Within 30 days after receipt of all pertinent documentation, the ACHP shall exercise one of the following options:

- a. Advise the XXARNG that the ACHP concurs in the XXARNG's proposed response to the objection, whereupon the XXARNG will respond to the objection accordingly;
 - b. Provide the XXARNG with recommendations, which the XXARNG shall take into account in reaching a final decision regarding its response to the objection; or
 - c. Notify the XXARNG that the objection will be referred for advisory comments of the ACHP in accordance with 36 CFR 800.7(b).
2. Should the ACHP not exercise one of the above options within 30 days after receipt of all pertinent documentation, the XXARNG may assume the ACHP's concurrence in its proposed response to the objection.
 3. The XXARNG shall take into account any of the advisory comments of the ACHP provided in accordance with this stipulation with reference only to the subject of the objection; the XXARNG's responsibility to carry out all actions under this MOA that are not the subjects of the objection shall remain unchanged.
 4. At any time during implementation of the measures stipulated in this MOA, should an objection pertaining to this MOA or the effect of the undertaking on historic properties be raised by a member of the public, the XXARNG shall take the objection into account.

F. Termination.

1. If the XXARNG determines that it cannot implement the terms of this MOA, or if the NGB or XX SHPO determines that the MOA is not being properly implemented, the XXARNG, the NGB or the XX SHPO may propose to the other signatories to this MOA that it be terminated.
2. The party proposing to terminate this MOA shall so notify the other two signatories to this MOA, explaining the reasons for termination and affording them thirty (30) days to consult and seek alternatives to termination.
3. Should such consultation fail the XXARNG, NGB or the XX SHPO may terminate the MOA. Should the MOA be terminated, the XXARNG shall either:
 - a. Consult in accordance with 36 CFR 800.6 to develop a new MOA; or
 - b. Request the comments of the ACHP pursuant to 36 CFR 800.7.
4. If the terms of this agreement have not been implemented by (insert number of years after the date of the signatures in Section III below), this MOA shall be considered null and void. In such event the XXARNG shall so notify the signatories to this agreement, and if it chooses to continue with the undertaking, shall re-initiate review of the undertaking in accordance with 36 CFR Part 800.

G. Execution.

1. Until a signed copy of the MOA has been filed with the ACHP the MOA is not valid. A signed copy will also be sent to the Department of the Army, Assistant Chief of Staff for Installation Management for their files.
2. Execution of this MOA is intended to evidence the XXARNG's compliance with §106 of the NHPA. This fulfills Section 106 for this action.

SAMPLE
MEMORANDUM OF AGREEMENT

AMONG
THE NATIONAL GUARD BUREAU,
XXXX ARMY NATIONAL GUARD

AND
THE XXXXSTATE HISTORIC PRESERVATION OFFICE
FOR THE
Insert Project Title
(insert year)

Signature Page

NATIONAL GUARD BUREAU

By: _____
JEFFREY G. PHILLIPS
Colonel, US Army
Chief, Environmental
Programs Division

Date: _____

XXXX ARMY NATIONAL GUARD

By: _____
xxxxx x. xxxxxxxxxxxx
Major General, XXXX Army National Guard
The Adjutant General

Date: _____

XXXXSTATE HISTORIC PRESERVATION OFFICER

By: _____
xxxxxx x. xxxxxxxxxxxx
State Historic Preservation Officer

Date: _____

CONCURRING PARTIES: (as applicable)

XXXXXX HISTORICAL COMMISSION or XXXX NHOS

By: _____
xxxxxx x. xxxxxxxxxxxxxxxxxxxx
Title

Date: _____



HAWAII ARMY NATIONAL GUARD

Environmental Policy



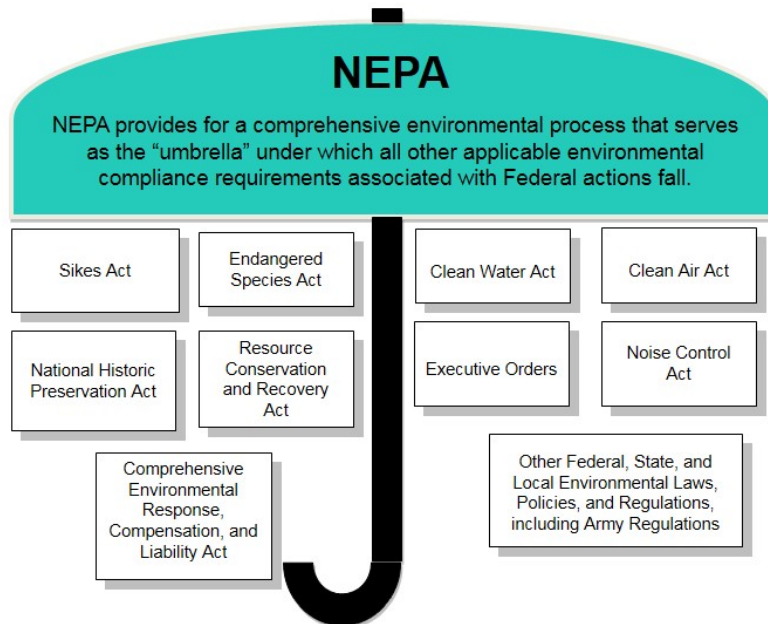
Major General Darryll
D.M. Wong
The Adjutant General
State Of Hawaii
Department Of Defense

- All HIARNG facility users must be aware of the environmental policy!
 - <http://dod.hawaii.gov/env/tag-environmental-policy/>
- Main points in the policy:
 - 1) Commitment to continual improvement.
 - 2) Comply with all applicable laws and requirements.
 - 3) Commitment to pollution prevention.

1



HAWAII ARMY NATIONAL GUARD



2



HAWAII ARMY NATIONAL GUARD



The **National Environmental Policy Act (NEPA)** is a Federal law that the HIARNG is ***required*** to follow.

- NEPA encompasses a long list of laws, EOs, regulations to ensure agencies consider all environmental impacts before making a decision.
- HIARNG Actions that require NEPA review include (but are not limited to)...

Innovative Readiness Training (IRT)

Military Training

Altering or demoing Historic Buildings and/or structures

Any ground disturbance activities

Military construction/operations and maintenance

Preparation of Real Property Development Plans (RPDPs)

Equipment modernization

3



HAWAII ARMY NATIONAL GUARD REC Check Form

http://nghienv/forms/REC_CK_FINAL2013.pdf



Enviro Tracking #:	ARNG ENVIRONMENTAL CHECKLIST		State ARNG
Enter information in the yellow shaded areas.			
PART A - PROJECT INFORMATION			
1. PROJECT NAME:			
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED:	
4. DESCRIPTION AND LOCATION OF THE PROJECT/PROPOSED ACTION:			
a. Location (Include a Detailed Map):			
b. Description:			
c. The proposed action will involve (check all that apply):			
<input type="checkbox"/> Training Activities/Areas <input type="checkbox"/> Construction <input type="checkbox"/> Natural Resource Management <input type="checkbox"/> Maintenance/Repair/Rehabilitation <input type="checkbox"/> Real Estate Action <input type="checkbox"/> Environmental Plans/Surveys <input type="checkbox"/> Innovative Rediness Training Project <input type="checkbox"/> Other (Explain):			
d. Project Size (Acres):		Acres of New Surface Disturbance (Proposed):	
(if applicable)		(if applicable)	
5. START DATE of PROPOSED ACTION (dd-mmm-yy):			
6. PROGRAMMED FISCAL YEAR (if applicable):			
7. END DATE (if applicable):			
PART B - DECISION ANALYSIS GUIDE			
To use a categorical exclusion, the project must meet the following criteria: no segmentation, no exceptional circumstances and a qualifying categorical exclusion. The following decision tree will guide the application and documentation of these three screening criteria. The criteria were extracted from 32 CFR Section 651.29 and			

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HAWAII ARMY NATIONAL GUARD



Cultural & Historical Resources Training 2015

5



HAWAII ARMY NATIONAL GUARD



13 Archaeological Sites Currently Found at KMR

Site 1 - This complex of mounds, pits and enclosures likely represents a late 19th century activity area with temporary habitation and agricultural pits, associated with the Puna Trail. SHIP 50-10-35-30010. Eligible for the Nation Register under Criterion D. No Further Work.

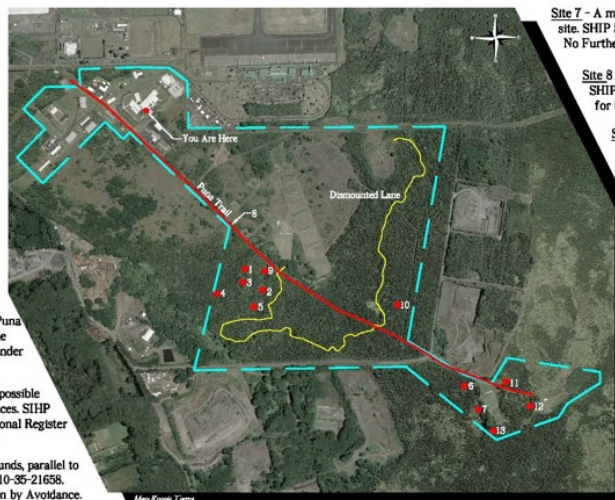
Site 2 - A 23 ft. long terraced wall, possibly used as an activity center or temporary habitation area. SHIP 50-10-35-30216. Eligible under Criterion D. No Further Work.

Site 3 - A 50 ft. long remnant portion of the Puna Trail. SHIP 50-10-35-30012. Eligible under Criterion D. No Further Work.

Site 4 - Two agricultural planting features near a 50 ft. portion of the Puna Trail. SHIP 50-10-35-23273. Only the portion of the Puna Trail is eligible under Criterion D. No Further Work.

Site 5 - A low rock wall and mound, possible used for Hawaiian agricultural practices. SHIP 50-10-35-30217. Eligible for the National Register under Criterion D. No Further Work.

Site 6 - Five stacked stone Ahu or mounds, parallel to the pre-historic Puna Trail. SHIP 50-10-35-21658. Eligible under Criterion D. Preservation by Avoidance.



Site 7 - A modified lava tube and temporary habitation site. SHIP 50-10-35-3009. Eligible under Criterion D. No Further Work.

Site 8 - A modernized section of the Puna Trail. SHIP 50-10-35-18869. Not considered eligible for the National Register. No Further Work.

Site 9 - A constructed rock wall and agricultural pit that likely dates to the Puna Trail. SHIP 50-10-35-30011. Eligible under Criterion D. No Further Work.

Site 10 - A late 19th century way station for road crews working on the Puna Trail. Features include a horse enclosure, platforms, pits and rock walls. SHIP 50-10-35-21771. Preservation by Avoidance.

Site 11 - A 70 ft. remnant portion of the pre-historic Puna Trail. SHIP 50-10-35-30038. Preservation by Avoidance.

Site 12 - A C-shaped military artillery position enclosure. SHIP 50-10-35-21657. No Further Work.

Site 13 - A modified lava tube measuring 40 ft by 13 ft, used as a possible recurrent shelter. SHIP 50-10-35-30008. No Further Work.

KMR is the HIARNG's largest installation and most actively used for soldier training. KMR also has the most archaeological sites of all the HIARNG installations. It is imperative to follow the SOPs listed in the ICRMP to ensure continued mission readiness in conjunction with preserving our cultural resources.

6



HAWAII ARMY NATIONAL GUARD National Historic Preservation Act



It is the HIARNG's Federal Responsibility to protect all historic properties on our lands under the NHPA and 36 CFR 800.

As defined by the National Historic Preservation Act of 1966, a Historic Property:

Historic Bottle



Any prehistoric or historic site, district, building, structure, or object included in the National Register of Historic Places. This term includes artifacts, records, and remains as well as properties of traditional religious and cultural importance to a Native Hawaiian Organization.

Cultural Site at KMR



Poi Pounder



Ft. Ruger Historic District



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HAWAII ARMY NATIONAL GUARD



Field Training SOPs



1. If you come across a historic property, avoid the site and leave it in place.
2. Sites are ambiguous and can include rock mounds, rock walls and pits.
3. If you come across an artifact, leave it in place. Looting is illegal!
4. BE RESPECTFUL AND USE COMMON SENSE

8



HAWAII ARMY NATIONAL GUARD

Repair and Maintenance to Historical Buildings
Eligible for the National Register of Historic Places



Kalaeloa – Bldg 117

KMR – Nurses Cottage



Kalaeloa – Bldg 282

Review the ICRMP to determine if the building is eligible for the National Register. If the building is eligible, ensure the contractor is aware of the federal regulations they must follow. Refer to the Secretary of the Interior's "Standard for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" in your SOW and contract.

All renovations/repairs shall match existing material, color and design to withhold the historic integrity of the HIARNG's historic buildings and structures.

Coordinate with the Cultural Resources Specialist to initiate a letter to the State Historic Preservation Division (SHPD) for their concurrence on our project.

They are allowed a 30-day review period.

9



HAWAII ARMY NATIONAL GUARD



Endangered Species Training
2014

10



HAWAII ARMY NATIONAL GUARD Endangered Species Act It's the Law!



Endangered Species Act of 1973

- **PURPOSE**...to provide a means to conserve ecosystems upon which endangered and threatened species depend

Penalties

- The most punishable offenses are trafficking, and any act of knowingly "taking" (which includes harming, wounding, or killing) an endangered species.
- The penalties for these violations can be a maximum fine of up to \$50,000 or imprisonment for one year, or both, and civil penalties of up to \$25,000 per violation, may be assessed.

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HAWAII ARMY NATIONAL GUARD Kekaha Firing Range Threatened and Endangered Species



Hawaiian goose, *Nene*,
Branta sandvicensis



Hawaiian Hoary Bat, 'ope'ape'a
Lasiurus cinereus semotus



Niihau panicgrass, lau 'ehu,
Panicum niihauense

If you see any of these
species at KFR,
please report to
HIARNG ENV
672-1255 or 672-1013



Hawaiian short-eared owl, *Pueo*,
Asio flammeus sandwichensis



Hawaiian black-necked stilt, *Ae'o*,
Himantopus mexicanus knudseni

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HAWAII ARMY NATIONAL GUARD

Ukumehame Firing Range, Maui

Threatened and Endangered Species



Hawaiian goose, Nene,
Branta sandvicensis



Hawaiian Hoary Bat, 'ōpe'ape'a
Lasiurus cinereus semotus



Blackburn's Sphinx Moth,
Manduca blackburni



Hawaiian coot, 'Alae ke'oke'o,
Fulica alai



Hawaiian Duck, *Anas wyvilliana*
Koloa maoli (native duck)



Hawaiian black-necked stilt, Ae'o,
Himantopus mexicanus knudseni

13



HAWAII ARMY NATIONAL GUARD

Keaukaha Military Reservation, Hilo, Hawaii

Threatened and Endangered Species



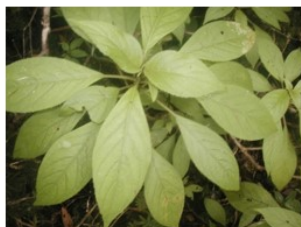
Hawaiian Hawk, *Buteo solitarius*, 'Io



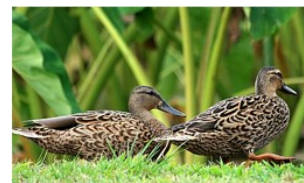
Hawaiian Hoary Bat, 'ōpe'ape'a
Lasiurus cinereus semotus



Blackburn's Sphinx Moth,
Manduca blackburni



Cyrtandra nanwaleensis



Hawaiian Duck, *Anas wyvilliana*
Koloa maoli (native duck)

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HAWAII ARMY NATIONAL GUARD

Regional Training Institute, Waimanalo, Oahu
Threatened and Endangered Species



Hawaiian Hoary Bat, 'ōpe'ape'a
Lasiurus cinereus semotus



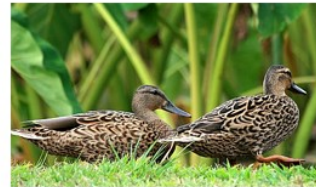
Hawaiian black-necked stilt, Ae'o,
Himantopus mexicanus knudseni



Hawaiian coot, 'Alae ke'oke'o,
Fulica alai



Hawaiian Common Moorhen,
Gallinula chloropus sandvicensis,
'Alae 'ula ("red forehead")



Hawaiian Duck, *Anas wyvilliana*
Koloa maoli (native duck)

15



HAWAII ARMY NATIONAL GUARD



Pest Management & Invasive Species Training
2014

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HAWAII ARMY NATIONAL GUARD Pest Management



- Responsibilities for ALL HIARNG Personnel:
- CoS Memo for Feral Animals- *Do Not Feed Feral Animals*
- Inform personnel observed feeding of the installation policy and request that they stop. If feeding persists, higher CoC
- REPORT all sightings of feral/stray animals around HIARNG Facilities/Installations to Pest Management Coordinator.



ENV Pest Management Coordinator:
Craig Blaisdell
672-1278, craig.blaisdell.nfg@mail.mil



HAWAII ARMY NATIONAL GUARD Invasive Species



- **What is an invasive species?** Plant, animal, or microbe whose introduction does or is likely to cause economic or environmental harm or harm to human health
- **Ecological and Economical Impacts:** Invasive species threaten Hawaii's watersheds and native ecosystems. They also cost the state hundreds of millions of dollars in agriculture revenue.
- **Mission Impacts:** On military lands, invasive species can impair mission exercises, troop readiness, and eliminate or reduce the quality and quantity of suitable available training land. The spread of invasive grasses increase the risk of wildfires and prevent live-fire training.

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HAWAII ARMY NATIONAL GUARD Invasive Species on Big Island



What to look out for on HIARNG Installations:
Big Island Facilities

- Miconia (*Miconia Calvescens*)
- Albizia (*Falcataria moluccana*)
- Little Fire Ant (*Wasmania auropunctata*)
- Feral Pigs (*Sus scrofa*)



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HAWAII ARMY NATIONAL GUARD Invasive Species on Oahu



What to look out for on HIARNG Installations:
Oahu Facilities

- Fountain grass (*Pennisetum setaceum*)
- Fireweed (*Senecio madagascariensis*)
- Feral (free-range) Cat (*Felis catus*)
- Coqui Frog (*Eleutherodactylus coqui*)



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HAWAII ARMY NATIONAL GUARD Invasive Species on Maui



What to look out for on HIARNG Installations: Maui County Facilities

- Fountain grass (*Pennisetum setaceum*)
- Little Fire Ant (*Wasmania auropunctata*)
- Coqui Frog (*Eleutherodactylus coqui*)
- Axis Deer (*Axis Axis*)



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HAWAII ARMY NATIONAL GUARD Invasive Species on Kauai



What to look out for on HIARNG Installations: Kauai Facilities

- Mongoose (*Herpestes javanicus*)
- Long-thorn Kiawe (*Prosopis juliflora*)
- Giant Reed (*Arundo donax*)
- Golden Crownbeard (*Verbesina encelioides*)



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HAWAII ARMY NATIONAL GUARD

Invasive Grasses & Weeds

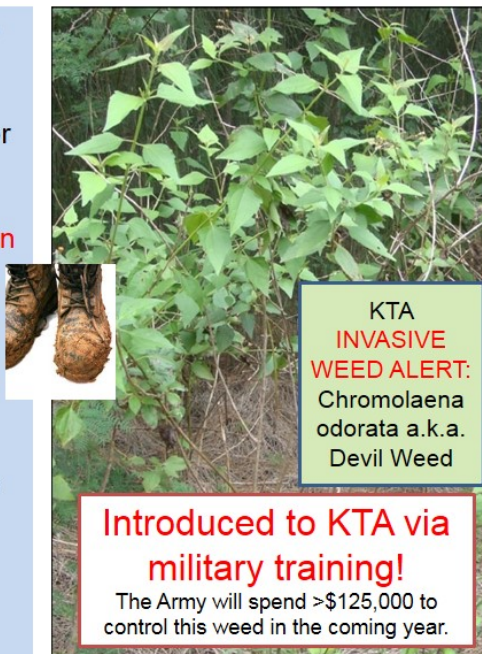


INVASIVE GRASSES
are fuel for fires.
Do not spread seeds
across training areas or
between islands.

**Immediately upon return
to your base:**

- Wash boots & equipment
- SCHEDULE and USE vehicle wash racks

Always wash vehicles
and boots before
traveling between
islands.



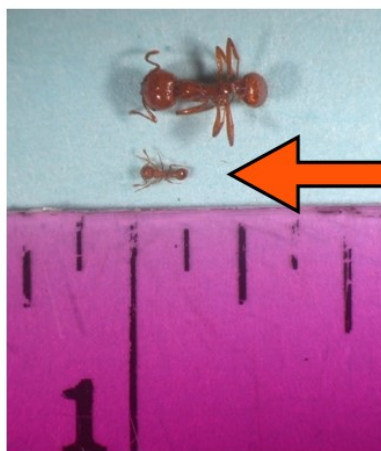
HAWAII ARMY NATIONAL GUARD

Little Fire Ants: *Wasmannia auropunctata*



Little Fire Ant

is ***much smaller*** than the
Tropical Fire Ant (pictured)



Size: only as long as a
penny is thick.



The nastiest of the invasive ants,
with the greatest impact on Hawai'i, is the little fire ant.



HAWAII ARMY NATIONAL GUARD LFA Test: Peanut Butter on Chopsticks



- ENV will treat known locations

****REPORT ALL POSSIBLE SIGHTINGS/STINGS ON HIARNG PROPERTY**

Craig Blaisdell, 672-1278, craig.blaisdell.nfg@mail.mil.

Angela Kieran-Vast, 672-1255, angela.kieranvast.nfg@mail.mil

OFF-Site/NOT ON HIARNG PROPERTY TO: (808)643-PEST

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HAWAII ARMY NATIONAL GUARD Little Fire Ant (LFA)

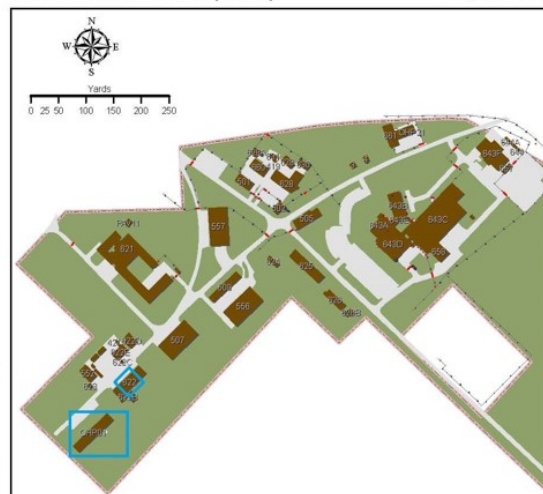


LFA @ KMR:

- CHP01 confirmed presence, LFA has been treated to establish buffer to 20ft. from building.
- Warehouse Bldg 622 confirmed presence, ongoing treatment. Exercise extreme caution if entering/working around Bldg 622. If at all possible try not to move items outside of the warehouse until treated.
- Negative test results in cinder piles, ¼ of AA site. Ongoing surveys as weather permits.
- JUNE AT: Always wash vehicles boots and equipment before entering AND leaving KMR. Call ENV x1278 if you suspect LFA presence in KMR training areas/ranges.

KEAUKAHA MIL RES (15A10)

Hilo, Hawaii Coui



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HAWAII ARMY NATIONAL GUARD Coconut Rhinoceros Beetle (CRB)



- Large 2" scarab beetle
- Heavy infestation at Joint Base Pearl Harbor-Hickam, Oahu
- HIARNG involved in multi-agency project to eradicate CRB
- Sign of beetle damage (hole in the base of palm frond or crown of coconut tree; or v-shaped cuts in fronds)



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HAWAII ARMY NATIONAL GUARD CONTACTS:



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